

## **PUBLIC SUBMISSION-27<sup>th</sup> January 2022**

To the Chief Executive Officer,

This letter is being written with regards to the Development Application, DA210040 Intensive Animal Industry (Cattle Feedlot) at 326 Downies Road, Three Moon.

We have reviewed the plans and documents provided on the council website, but due to the extensive amount of pages, plans and reports in the submission we feel we haven't really had enough time to review the information thoroughly over the past weeks. There are a few concerns that we would like noted with regards to the application.

### Dust

The Feedlot will create a lot of dust due to the amount of traffic and trucks travelling on Downies Road and even more so as the driveway and the entire Feedlot will be dirt. All residents in this area collect rainwater for drinking, there is a possibility of increased particulate and bacterial contamination. Dust from feedlots and saleyards have been proven to carry increased concentrations of E-Coli bacteria & Q fever as it is often in the soil.

### Noise

We do have concerns with regards to the noise that the feedlot could create. Certain times throughout the afternoon and night we can currently hear the dogs barking, and at certain times during the day the operation of the piggery. As operating hours are well outside of general operating times, its most likely that is when it will be at peak noise, during cattle loading in early mornings or late evenings.

### Pollution to waterways

Three Moon Creek, in flood season, often runs into the flats below our property. We do have concerns with the environmental impact of potential contamination if this was to occur. We are confident that Council will address this concern to ensure peoples land and waterways are protected.

### Carrying capacities

Is there the opportunity for numbers to be increased if this feedlot needed to grow?

### Lifestyle

We purchased our block in October 2015 knowing that there was a Piggery in operation approximately 1 km away. At times, depending on wind direction and the coolness of the air we can smell the odour from the Piggery. Our block was purchased as a lifestyle block to grow and breed cattle and enjoy the scenery that it provided. There is the possibility the development of the feedlot will be seen from our property, impacting our view.

### Valuations to property and community

How much impact will this feedlot have on the value of all the surrounding properties and will it be seen as a negative?

We are definitely not against growth within our Monto community but this feedlot will only employ family members, with the possibility of 2 part time employees and the construction to be done will also be by them. There seems to be little direct benefits to Monto community itself.

We appreciate that an extensive amount of research and analysis that has gone into this submission, however, we are concerned that the findings are difficult to measure and are not guaranteed.

Thank you for taking the time to read our concerns with regards to this submission. We trust Council will address all concerns and resolve any issues that may arise.

Regards

Lindsay and Toni-Anne Baumann  
910 Airport Road  
Three Moon Q 4630  
0427 812 649  
[taward71@bigpond.com](mailto:taward71@bigpond.com)

26/01/2022

To the Chief Executive Officer,

We are writing in regards to the Development Application, DA210040 Intensive Animal Industry (cattle feedlot) in 326 Downies Road, Three Moon.

As owners of residences 813 Airport Road and the unmentioned 754 Airport Road (our primary residence), we write to you with our concerns for the proposed feedlot. Having received a letter during the Christmas period informing us of the proposed feedlot we feel that the time to read such an extensive report was inadequate, however with the limited time made available, we have reviewed the application and would like to note some concerns we have found.

### Odour

Owning two houses in the SE direction of the proposed feedlot we feel our main concern would be the odour that would be produced from the feedlot. The prevailing SE winds are frequent and would impact not only our homes but also the ones of our closely located neighbours. Our homes are designed to capture the South Easterly breezes. As we rent out residence 813 we believe that with the odour plume from the feedlot over the home would make it difficult finding tenants, affecting our income. We do get an occasional odour from the Bailey Creek piggery located approximately 2km south, when the wind blows from a southern direction.

We can see the location of the feedlot from our home at 754 Airport rd even though 6.4.1.8 states that no residential dwellings have views of the proposed development site from the west in which the visual effect is the greatest.

### Dust

As noted in 4.1.5 the access and internal roads will be approximately 5m wide and remain unsealed. With the expected amount of traffic on these roads combined with wind directions we expect to be impacted by dust and air carried particulate and bacterial contaminations in our homes and rain water tanks.

Contaminants such as E-Coli and Q fever from research have shown to be common in saleyard and feedlot soils.

### Solid waste

As noted in 4.1.10.3 solid waste will be applied to land where it can be sustainably utilised by crops or pasture and soil. As neighbours of the area that will be used as the solid waste location I am concerned about fresh feedlot manure used on the paddocks in relation to antibiotic resistance in humans. Research by the University of New England, found 30 to 75% of the antibiotic-resistant bacterial load in fresh manure was present in soil treated with fresh manure. 'Queensland County Life, Thursday 20, 2022'

### Maximum carrying capacity

The feedlot proposal is for 1450 SCU. Will this number be able to be changed in the future to allow for feedlot growth?

## Mortalities

We are unable to identify the proposed development site in Figure 3 for the mass mortality burials as stated in 4.1.10.1.3. We would like knowledge of this location.

## Location and lifestyle

We moved from the West to Monto in 2010 after finding an ideal small block within close proximity to town. We moved here with 2 small children with the goal to settle on acreage. Monto provided small acreage blocks in particular along Airport Road. In 2015 we purchased the farm block next door and too continue our primary producer business. We have been fortunate to have great neighbours who also set out to find their own land opportunities along Airport road. I believe that these areas are more rural residential than rural blocks. We have made Monto our home and hope to be able to call it home in the future.

## Property valuations

We believe that if the proposed feedlot goes ahead all properties surrounding it will be effected by lower land valuations.

## Environment

We are concerned about floodwater/effluent/ waste runoff into the water ways with the feedlot being so close to the Three Moon Creek and the Burnett Basin. Even though the creek doesn't track through our land we are still apprehensive about the environmental management of this development. We have had multiple flood events whilst we have lived here and have seen where the flood waters flow.

Due to the complexity and length of this report I would hope that the council takes on board the concerns that landholder's voice. For further information or queries please don't hesitate to call us.

Regards,

*Michael and Tracy Blue*

754 Airport Road, Three Moon 46930

Phone: 0417867902

mtreblue@bigpond.com

28 February 2022

North Burnett Regional Council

PO Box 390

GAYNDAH QLD 4625

**Re: Development Application for: Material change of use - Intensive Animal Industry for Feedlot on Lot 52 & 53 RW103 326 Downies Road, Three Moon.**

To whom it may concern: (David, John & Lyn)

This letter is written confirmation in support of the Feedlot mentioned above and application submitted by Dale & Steph Olive. We neighbour the proposed site to the north on Lot 54 & 55 RW104 at 144 Downies Road, Three Moon.

Regards

A handwritten signature in black ink, consisting of the letters 'GRD' followed by a horizontal line with a small upward tick at the end.

Geoff Downie

**Lyn McLeod**

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**From:** Sue Gray <suegraythehut@gmail.com>  
**Sent:** Friday, 21 January 2022 12:45 PM  
**To:** North Burnett Regional Council  
**Subject:** DA210040 – 326 DOWNIES ROAD, THREE MOON (52 & 53 RW103) – INTENSIVE ANIMAL INDUSTRY (CATTLE FEEDLOT UP TO 1450 SCU)

Good afternoon,

I just wanted to drop a line of support to the family at **DA210040 – 326 DOWNIES ROAD, THREE MOON (52 & 53 RW103) – INTENSIVE ANIMAL INDUSTRY (CATTLE FEEDLOT UP TO 1450 SCU)**

So wonderful to see young local families taking the initiative bringing more production and growth to the local area. You definitely have my support!! ✓  
Kind regards,  
Susan Gray

To the Chief Executive Officer, North Burnett Regional Council,  
cc. Cr Les Hotz & Cr Melinda Jones

From Matthew Jamieson, 755 Airport Road Three Moon, Q

28 January 2022

Objection to Proposed Feed Lot on Downie's Road, Three Moon

I have been resident at 755 Airport Road, Three Moon on and off for 58 years. I was born in Monto and my family first settled on the property which my land is part of in 1922. My father was the celebrated Monto artist Gil Jamieson.

Currently my focus is establishing an art gallery called 'Monto Museum of Art Home to the Gil Jamieson Collection' at the building I own with my daughters at 15-17 Newton Street Monto. I see Monto and the surrounding area as a thriving community with an expanding cultural tourism enterprise. I want to amplify this process by putting my father's work on permanent display in Monto.

Already much community effort has sought to display an artistic and environmental attitude and promote tourism in the town. Monto and surrounds has become a good place that people come to live and enjoy. Establishing a feedlot next to Mulgildie town and school and adjacent to the many properties, which are essentially rural residential, close to town, will not enhance the qualities that make Monto a great place to visit and live.

I have been told about the project and only began to look the documentation on the Sunday 23 January 2022. I looked at a hard copy of the document for a while during the week. Given the size of the document I am unable to give it the time necessary to undertake a thorough analysis.

I regret that the developer has used the Christmas period to release the proposal for public submission. This approach is common to developers attempting to subvert a public process and proceed with a project with lesser degree of scrutiny. This approach means fewer people learn about the proposal, relevant government personnel are on holidays and it is hard for the affected community to obtain expert opinion, as most professionals are also on holiday. I think the assessment authority & the North Burnett Regional Council, should extend the comment period for another 30 days to allow adequate process and analysis.

From my perspective as an affected local landholder the issues of the down wind plume of odour and contaminated dust and the disposal of waste are of major concern. My assessment the proposal should not be approved by Government and is not consistent with the community's welfare or the kind of enterprise developing in this community.

## 1/ Odour

I note the neighbouring residence of Tracy & Michael Blue on Airport Road Three Moon and also 3 - 4 residences north of the Three Moon silo were not included in the analysis, making the project analysis incomplete. The report uses a method for analysing impact, which is not easily understood by the public. My initial reading of the report suggests that the analysis of odour is superficial and inadequate.

Prevailing wind mean that at least 13 and maybe 16 households on Airport road would be inside close contact of distance of 4 – 6 km for the odour and downwind the plume on the South east prevailing wind.

The analysis disqualifies any cumulative effect of the Hill piggeries in Bailey creek and the Feedlot at Dowling's. Bailey Creek piggery does cause a bad smell at my property at 755 Airport Road when light wind blow from that direction. The smell from the feedlot of Dowling's was considerable and at times very intense when that business was operational. When the wind was from the north and the feedlot was operational the unpleasant odour of the feedlot would come to 755 Airport Road. Location of both these sites means that significant smell from these sites is more infrequently experienced than the new proposal.

The cumulative effective and location of the proposed open-air feedlot mean that the rank smell will be encountered on surrounding downwind properties on a very regular basis. If the proposal were to proceed smell can come from more directions more often. The cumulative effect is that foul feedlot or piggery odour will be encountered significantly more often & especially since the proposal is directly downwind of these properties on Airport Road.

The south easterly is by far the most frequent prevailing wind, which seems to be supported by the information resented in the report. My reading of report and experience from living at the site would lead me to believe that the effected household would expect to be impacted by smell from the proposal the majority of the time.

Dowling's feedlot was very stinking used surface spreading of waste on land which was also not as prone to high volume cross flow flooding as the current proposal.

Black soil substrate in the proposed feedlot area will cause pugging when wet and will presumably has potential to cause even more smell than Dowling's operation. The Dowling feedlot operation is on sand/ loam from Hurdle Gully. The Bailey Creek piggery site is also benefited by the sandy substrate surrounding the location. The wet black soil at the proposed site is boggy when wet, has potential to produce more smell and will prove difficult to operation with machinery when wet for remove dead cattle and solid waste.

Wet conditions and waste and combined with black soil mud will not be good for livestock foot health in the feedlot.

## 2/ Airborne health risks and dust from feed proposal

Rainwater is collected from the roofs of all the residences along Airport Road and is used for household use and drinking. The downwind proximity of these households to the feedlot proposal and the site for spraying of feedlot wastes out onto the ground means that feedlot contaminated dust and particulate can end up in the drinking water. This has serious negative impacts for water quality and cause increase bacterial contamination of tank water for these residences. Dust from feedlots and saleyards is known to carry increased concentrations of E-coli bacteria.

In my lifetime there has been an appreciable decrease in the fly population in the area. I believe this is because of the reduction in open piggeries and dairy's and associated open sumps, together with the introduction of dung beetles. Again downwind of proposed feedlot, sump and the pump sites for untreated faecal material sprayed onto the flats would cause increase fly populations all year round.

Increased possibility of exposure to the debilitating illness Q-fever caused by breathing in air containing dust contaminated by cattle is another issue facing the downwind residences.

## 3/ Waste disposal Rainfall and waste storage ponds

The report states that the ponds onsite would account for a 1 in 10 rainfall event but obscures further analysis by not providing the area of drainage for the contaminated feedlot area. The analysis does not provide detail of the area for this catchment or the volume of the sumps.

My measurement of the project site indicates a 9 - 10 hectares drainage area for feedlot and sump. Assuming that the site, is already saturated, 25 mega-litres would be produced from a 10 inch (250MM) rainfall runoff event. Likewise a 50mm of runoff would produce 5 mega-litres of runoff.

ha site	Conv. to m2	Mitres rain event	M3 runoff
10	10000	0.25	25000
10	10000	0.05	5000

In comparison the 2013 rainfall event and subsequently flood was a 36 inch (925mm) rainfall event. Big rain happened also in 2011 & 2015. I recall it being said those were three 1 in 100 year or bigger flood events. It would be useful if the report analysed actual recent rainfall data to model the project against capacity of the site to deal with flow in.

My estimate based on measurement from the map is that the 0.9 m freeboard on the sump provides an additional sump expansion volume of only 5 mega-

litres. The sump would therefore overflow after a rainfall event with greater than 50 mm runoff.

Given that climate change and increasing severity of rainfall events is highly likely that the project will produce significant runoff of uncontrolled drainage and raw effluent flow into the Three Moon Creek on a more than the analysis suggests.

I think the project design does not adequately contain the volume of water the site will experience.

We have had direct family experience of a potentially fatal Leptosporosis episode derived from floodwater, which probably has come from the neighbouring dairy farm. The pathogen risk associated with the proposal does not appear to be outlined in the documentation, especially given the proximity to Mulgildie and the likelihood of contamination of the waterway.

#### 4/ Disposal of wastes on the Three Moon flats

The method of spreading the effluent onto the flats in wet times does not seem to have been adequately discussed. A strategy for dealing with effluent during wet times and potential for contamination of the Three Moon creek is not addressed.

In flood and high rainfall times there is significant likelihood that the effluent pond overflows and the only way to address the overflow is to spray the excess onto the flats. At such times in major rainfall events the effluent would likely wash in to the Three Moon Creek.

Depending on the size of the flow will impact on how the system is impacted. A low flow event will concentrate pollutant locally downstream, while a larger flow being causing dilution of the pollutant with wider downstream distribution.

I presume that water used for stock and processing of feed will primarily come from the irrigation bore on the flats. When this bore was established I understand that it had above 10,000 ppm salt. Assuming that the bore is still above 5000 ppm there will be a problem of concentration of salt through the process of evaporation over the project site. The feedlot waste will have elevated salt concentrations when applied to the irrigation area on the flat. I am concerned that this maybe a design flaw in the project as the report appears to promote an expectation that this effluent will be good for cropping.

The project does not propose composting of the feedlot wastes. Composting produces a very high value agricultural product, which is worth much more to cropping systems than the use of raw waste. Though as stated above salinity of input water impacts this as a proposition. Compost has less impact on the environment and is safer to handle.

#### 5/ Environmental and ethical issues of the project

Another issue is the relative environmental value of feedlot meat product. The production of feedlot cattle with HGP growth promotant implants make this product destined only for restricted markets. Concerns about HGP remaining in meat mean these cattle are excluded from countries where Government consider HGPs to a public health risk.

Cattle are a very inefficient grain converter compared to mono-gastric animal such as turkeys, chickens and pigs. Feedlot cattle are high methane emitters per kg of meat production and therefore are a higher per capital greenhouse emitter. For methane production this kind of meat production is higher than pasture fed cattle or mono-gastric production.

There is an argument that raw cattle faeces from feedlots should be high temperature controlled composted to reduce the potential for selection for anti-biotic resistant strains of pathogens and to reduce the bacterial load of the waste. Feedlot cattle are generally administered more antibiotics than pasture fed cattle.

Also the use of anaerobic ponds will contribute to the methane production at the site and impacts Climate Change in general. The proponent does not appear to analyse the potential for an alternative closed and covered production system with controlled waste disposal regime that captures methane production.

Matthew Jamieson  
755 Airport Road, Three Moon Q4630

Has a Bachelor degree in Science with majors in Entomology, Parasitology and Zoology. Has worked in the area of environment protection, impact of industrial resource project and indigenous rights in northern Australia and New Guinea and been a farmer from 1996 in cropping and horticultural crops, with 15 years of free-range monogastric animal production.

To the Chief Executive Officer, North Burnett Regional Council,

We, Peter and Nerida Jamieson are concerned about the proposed feedlot on **326 Downies Road, Three Moon.**

Our family are original long term occupiers of 757 Airport Road, Monto.

As residents our concern is 'odour' from feedlot as mentioned in their application, we are in direct path of prevailing S.E. winds. This will lessen the quality of living standards and impede us from looking at developing farm stay and tourist guiding to Hurdle Gully rainforest, a future enterprise that our children and their children would like to develop.

We have hosted weddings and held events in our well known manicured garden however the odour from the proposed feedlot will stymie this enterprise.

Our garden has been registered in the open garden format and we have hosted two open days. Many buses during festival times and garden club meetings often gather here plus the end of year break up celebrations. The outcome of these events over many years has built a good image of the area. I assume these events will be extremely compromised and may lose those good experiences that these people had at this location.

The frequent occupants of our existing residence have been 'motivational speakers' and 'Birds of Australia' groups, Landcare members, various organisations and many passing friends who often camp in our yard- too many to name all at this point given limited time frame to present this submission.

However here are a few of the top of my head whom have visited and stayed at our residence:

- Peter Kenyon, motivation speaker and WA Australian of the year 2017
- Ian Plowman , motivational speaker and presenter for small town growth
- Tom Debbah, Martial Arts Shihan, 8 Dan, nominated for hall of fame, his academy accepted to participate in the 2000 Sydney Olympic games
- Sir Edward Williams KBE KCMG, Australian of the year and Queenslander of the year 1983
- Members of the Bundaberg tourism board of which I was a member for 2 years
- Executive members of birds Australia have stayed and camped on property more than once to access rare bird life in the Hurdle Gully rainforest.
- Simon Blow, author authority on the Tai Chi Gong, has held workshops in Monto with high attendance locally and from NSW, Vic and Tasmania

- 6 Members of the Gold Coast fire brigade camped and stayed in cottage advising us on fire control in the area
- We are sure these visitations will cease if there is constant bad odour permeating this site. This will be a great loss for the entire community, which could through a bad experience be expressed to wider communities, state and federal

I believe this proposal needs much more council and conservation research before giving any approval especially re waste disposal.

It seems the proposal has been copied from previous feedlot establishment which are dated. Seems new established feedlots have looked at modernisation re: mitigating some negative effects, for example

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

Our concerns as historical members of Monto community i.e.; children of original settlers in 1923 by my Grandfather and my Uncle settled 4 blocks in 1923.

- We occasionally receive odour from existing piggery, usually on a southerly wind. Under feedlot proposed the odour will be received just about every day from SE trade winds in line with residence.
- Dowlings feedlot when in operational often provided a putrid odour
- Negative influence on tourism development in Monto area which at the moment had grown exponentially
- The proposal to use effluent on the Three Moon flats which periodically flood and would have detrimental effects on downstream waterholes etc. on the Three Moon creek. This would have negative effects on wildlife , fish, birds, amphibians and in general water quality
- The fact noted in proposal that this would only create 2 permanent jobs once infrastructure is completed compared to jobs of over 20 in existing piggery
- Traffic increase on Downies road creating more dust exposure
- Fact that it is right beside proposed bike trail on rail corridor passing Art Trail painted silos and historical sightings
- The feedlot will not be a good look with Monto's developing tourism industry in the North Burnett
- Attention drawn to QLD Country Life dated Thursday January 20<sup>th</sup> 2022, pg60 heading “*Manure link to human antibiotic resistance*”

- Diseases carried by air/ dust affecting rain water catchments
- If properties are devalued due to the feedlot project this will mean less rate revenue will be collected, effecting the bottom line of the entire shire

This is an area that is quite closely settled and a high scenic and liveable area a short distance from rapidly developing cities such as Bundaberg and Gladstone which now as we speak are upgrading roads to allow more visitations to inland areas to make these areas more attractive and accessible to visitors and future residents.

Our family, friends and close associates believe that much of future growth potential in the closely 'settled farming' community will be gained from 'farming people' with farm stays, air B&Bs, and general farming experiences for city people who more than ever are looking to connect with their farming cousins.

We believe establishment of factory type intensive farming will do nothing to enhance these opportunities and will have the opposite effect and turn people away from visiting.

Members of Monto and Mulgildie community past and present have made these towns a place many folks are now choosing to live and raise their families. Such an enterprise as the feedlot that can have up to 10,000 head in a small intensive area will without a doubt create environmental pressures especially considering its proximity to these two towns and closely occupied Three Moon farming residency. This proposed feedlot will without a doubt lessen the value of surrounding dwellings and farming land in its vicinity and could have a negative ripple effect on entire community in the long term.

We hoped to spend our final years on our farm. This community we both love and the community that has nurtured us and our family. Where we have lived for our productive years, raised our children, and have many friends. We enjoy wonderful clean environment, beautiful scenery and fresh air. Our family were looking forward to also living here. It appears that circumstances beyond our control could compel us to move on.

Over the years on this property we have had to overcome adversities e.g. Market fluctuations, negative agricultural politics, drought, fire and many floods.

This project has unexpectedly come from left field. The question is do we have we enough energy and drive to deal with this. This bombshell dropped in our midst over the Christmas period with very limiting time to address the problem.

Peter and Nerida Jamieson  
757 Airport Road, Three Moon

Re: Development Application for Material Change of use – Intensive Animal Industry (Cattle Feedlot), 326 Downies Rd, Three Moon. Lot 52 & Lot 53 RW 103 (Council ref: DA210040).

## SUBMISSION.

It is my submission that Council should consider this application very carefully and professionally with the **long term ramifications foremost**. Council should be mindful of the **long term footprint** of a feed lot in the area. There are a number of small holdings in the vicinity and I couldn't imagine any of the owners would consider building a substantial dwelling on any holding being close to a feed lot.

I submit that Council should not be swayed simply by the volume of the application (566 pages) followed by the applicants response to councils request for information (196 pages). Much of the content may be pertinent but simply takes many pages to say not very much. One example is the PERMIT issued to Mr & Mrs Olive under Environment Protection Act 1994 *Environmental Authority 2021 -26*. This Permit including drawings was 17 pages long. Another section is an INFORMATION SHEET. *Environmental Protection Act 1994, Internal Review and Appeals*. This section took up 12 pages. I did not take the time to digest the content of this information sheet but my initial thoughts would be that the information contained would only be of use to Mr & Mrs Olive if they were not in concurrence with something in the Permit. I could copy the 29 pages of these two examples into this submission but in my view it would only be padding, the same as it is in the application and response, **and of no value to my submission**.

The application has a professional look about it but it is only the **meaning of the content** that Council can act on. The application and response to councils request uses acronyms and ratings ? that mean little to many people and therefore unable to accurately make a submission on. An example of acronyms used is SBEMP and SOP1 used in the Information Request Response. Table 16 refers to Risk levels prior to Mitigation in one section as M17 Moderate and after mitigation the Risk level would be L5 Low. The question must be asked how much difference is there between M17 and L5 and how low is L5. There are other sections using H High M Moderate and L Low ratings.

**ALL THINGS CONSIDERED** it is councils decision whether or not is the Material Change of Use appropriate for the community **now and into the future**. If the council reached a position where it could approve the application with conditions then council should consider **how likely would the conditions be enforced** before approving the application.

SUBMISSION Completed by:  
Robert Roth, 382 Downie's Rd, Monto 4630 25<sup>th</sup> January 2022.  
Lot 37 RW 103.  
Email: [robert.roth2@bigpond.com](mailto:robert.roth2@bigpond.com)  
PH 0498204405

## **PUBLIC SUBMISSION - 25<sup>th</sup> of January 2022**

To the Chief Executive Officer,

I am writing in regards to the Development Application DA210040 for the Material Change of Use – Intensive Animal Industry (Cattle Feedlot) on 326 Downies Road, Three Moon.

We have reviewed the plans and documents provided on the council website, due to the extensive amount of pages, plans and reports in the submission we feel we haven't really had enough time to review it thoroughly over the Christmas period. However, with the limited time available, we have put together the following summary of concerns;

- **Odour and Air Quality;**

Our main concern is the smell that the feedlot will create and the impact of that on the air quality, especially around our house where our 3 small children live, but also for our surrounding neighbours, of which I can count at least 20 residential houses in a 3km radius. We already have an established piggery to the South of us, which is located 1.7km away. We currently smell that during the winter months and some early mornings with the southern breeze.

We built our new house in 2019 and designed it around the fact that we could possibly smell the piggery at certain times of the year. We effectively blocked that side off and designed the house with our main ventilation on the North East side, which directly faces Downies Road and the proposed Feedlot.

- **Dust and Air Pollution;**

Dust is also a concern due to the wind direction and wind speed, the amount of traffic that the Feedlot will create on Downies Road and the fact the driveway and the entire Feedlot will be dirt.

All residents in this area collect rainwater for drinking, there is a possibility therefore of particulate and bacterial contamination. Research shows dust from feedlots and saleyards have been proven to carry increased concentrations of E-Coli bacteria. Q fever, similarly, is associated with such facilities. Q-fever is caused by breathing in air containing dust contaminated by cattle and other farm animals which is concentrated in facilities like dirt Feedlots.

- **Noise;**

Similar to the above mentioned, we are concerned that noise will travel given the wind direction and the fact we can currently hear their dogs barking, as well as the piggery at certain times of the day.

Given the fact the operating hours are well out of general operating times, its most likely that is when it will be at peak noise, during cattle loading in early mornings or late evenings.

- **Pollution to waterways;**

Although we are not directly affected by the Three Moon Creek, we are still concerned about the environmental impact of potential contamination. We would hope Council would seek further information regarding this as the submission doesn't seem to address it.

- **Location;**  
We feel over the years that Airport Road has become a Rural Residential zone with smaller blocks and houses in close proximity. It has become a lifestyle area, not an industrial zone. These are the areas that will attract families, like ourselves, to the region. Where you are given the opportunity to live and work with close proximity to the Monto township but still get the benefit of living out of town. There are very few areas like this around Monto. My husband was born in Monto, and after a few years away gaining experience in his early twenties we moved back in 2010 to help run a local family owned and operated business. We spent a lot of years trying to find a suitable block to buy and build a house on that was far enough out of town to give us this lifestyle but still close enough for us to commute to work.
- **Property Valuation;**  
We are concerned that if the above issues aren't addressed and the Feedlot proceeds, then it will be seen as a negative and therefore effect the property valuation of ourselves and the surrounding land owners.
- **Community;**  
We both feel strongly that we want Monto to continue to grow in any industry that creates jobs which can afford people the lifestyle that Monto can produce. Unfortunately, this submission only proposes 2 part time jobs along with the 2 full time owners which currently already operate their own business. They also propose to do all their own construction, use their own machinery and plan to purchase any shortfall of feed, where possible, in the areas between Biloela to Bundaberg. There seems to be little benefit to the direct local community. The proposed Feedlot will then in turn affect around 20 close residences, families and their potential businesses.

We appreciate that an extensive amount of research and analysis that has gone into this submission, however, we are concerned that the findings are difficult to measure and are not guaranteed.

Intensive Animal Industries and Cattle Feedlotting is a specialised area and we would welcome a third parties view on this.

If this proposed submission goes ahead, Council should be prepared to fully support and take action on any future concerns and issues that arise from the Feedlot.

If you need any further information or have any queries, please don't hesitate to contact either of us.

Regards,

Cameron & Rachel Zieth  
904 Airport Road, Three Moon Q 4630  
Phone 0407645312  
[rach@djsteel.com.au](mailto:rach@djsteel.com.au)



## Creating a compassionate world

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28 January 2022

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

Sent via email to - [admin@northburnett.qld.gov.au](mailto:admin@northburnett.qld.gov.au)

### ***DA210040 - Material Change of Use - Intensive 1,450 SCU Feedlot in Three Moon Submission on behalf of Animal Liberation Queensland***

Dear North Burnett Regional Council,

Thank you for the opportunity to provide a submission concerning the proposed 1,450 standard cattle unit feedlot in Three Moon.

Animal Liberation Queensland (ALQ) is an independent not-for-profit organisation that acts on a broad range of animal protection issues.

After assessing the application and supporting documentation, I advise that ALQ strongly opposes the proposed development. Our reasons for this objection include:

- inaccurate water requirement estimates for the feedlot
- threat to endangered and vulnerable wildlife species
- adverse environmental impacts
- lack of regard for animal welfare
- a lack of consultation with Traditional Land Owners
- established significant community concerns relating to factory farming

A summary of the evidence base underpinning these objections is provided below.

## 1. Estimated water requirements are significantly undercalculated

ALQ understands that the applicants have a current surface water entitlement of 100ML per annum from the Three Moon Creek and 200ML from groundwater, which the applicant asserts is adequate to service the needs of the development at full capacity, as well as their extensive irrigated cropping operations.

The main area of water consumption for any feedlot is the drinking water of the cattle. According to a study from Meat & Livestock Australia<sup>1</sup> (co-authored by the applicant's Project Manager), an initial estimate for calculating the drinking water requirements for feedlot cattle is five litres per 50 kg liveweight, but this is greatly influenced by animal feed intake, breed, ambient temperature and weather.

According to the *National Guidelines for Beef Cattle Feedlots in Australia*<sup>2</sup>, a proposed feedlot would generally need to demonstrate access to approximately 24ML of high-security water per annum per 1,000 SCU of feedlot capacity. In addition to water for stock, this estimate includes water for the following purposes:

- dust suppression
- feed processing
- cattle wash down
- general cleaning
- staff and office amenities



The applicant has estimated an average of only 25.9L per head per day for drinking water for the cattle. Even at the cattle's entrance weight of approximately 350kg, at 5L per 50kg per day, this amount is under-calculated by almost 10L per animal per day. At the estimated exit weight of 600kg, drinking water requirements would be around 60L per head per day. This equals 27.7ML per year for drinking water, almost double the amount that has been estimated by the applicant.

Based on the *National Guidelines for Beef Cattle Feedlots in Australia*, the applicant should be demonstrating that they have access to '24ML per annum of high security water per 1000 SCU for total water requirements'. This equates to 35ML per annum for 1,450 SCU. Without knowing how much of the existing water entitlements the applicant currently utilises, we have serious concerns about the applicant's ability to provide adequate drinking water as well as water for dust suppression, trough cleaning and the other associated water requirements for feedlots.

Noting these considerations, we regard the estimated water requirements for this development to be significantly under calculated.

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1

[https://www.mla.com.au/globalassets/mla-corporate/research-and-development/program-areas/feeding-finish-and-nutrition/feedlot-design-manual/04-water-requirements-2016\\_04\\_01.pdf](https://www.mla.com.au/globalassets/mla-corporate/research-and-development/program-areas/feeding-finish-and-nutrition/feedlot-design-manual/04-water-requirements-2016_04_01.pdf)

2

<https://www.mla.com.au/%2Fdownload%2Ffinalreports%3FitemId%3D1628&usq=AOvVaw0K2tU22HIpKSWDKATewREM>

## 2. Threat to endangered and vulnerable wildlife species

The proposed site for this development is important for native wildlife, with 26 threatened species being observed within 5km of the land. These species include the critically endangered southern snapping turtle and the Eastern curlew. Under the *Fisheries Act 1994*, a major and moderate waterway that provides crucial fish passage is located on the proposed development site. Hydrological disruption may impact local wildlife populations that are dependent on these ephemeral waterways.



*Southern Snapping Turtle*



*Eastern Curlew*

Furthermore, 15 migratory shorebirds were identified within 5km of the subject land, including critically endangered species like the Far Eastern curlew and Curlew Sandpiper. These birds fly hundreds of kilometres around the world but their populations are in rapid decline due to habitat loss.

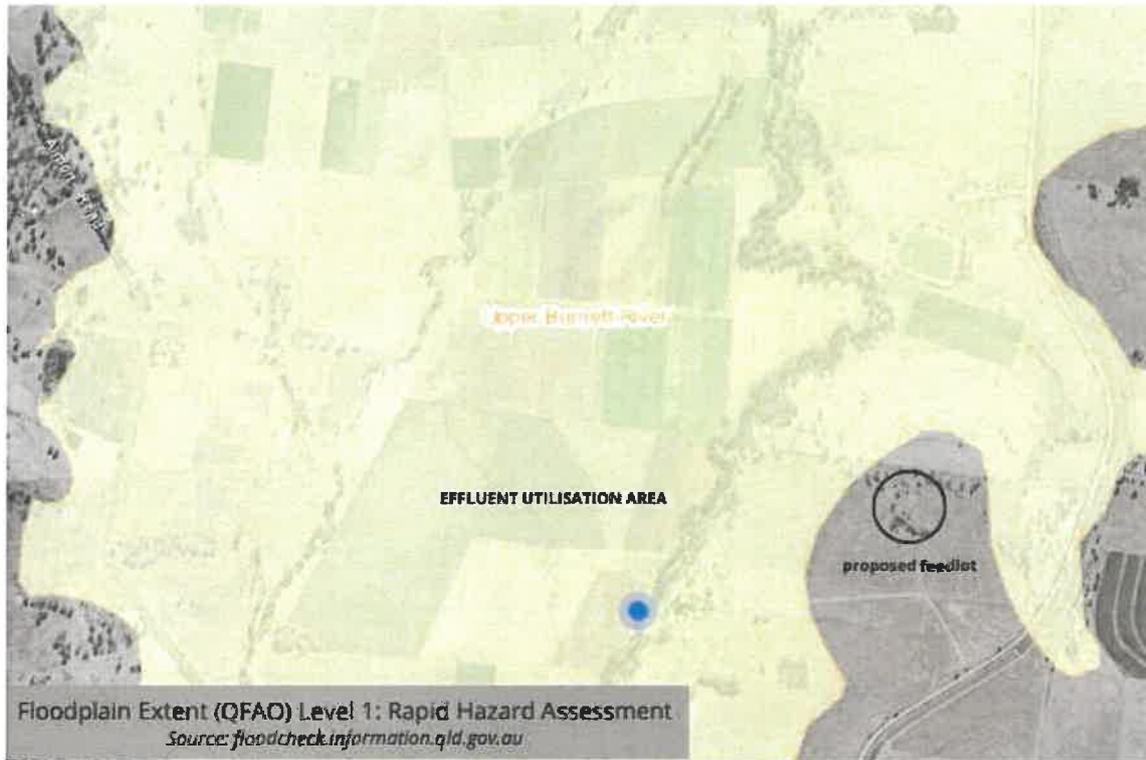
All of these species are highly sensitive to disruptions of their ecosystem, and their populations have already been decimated as a result of human activity. The North Burnett Regional Council has a responsibility to put the survival of these species above the business interests of the applicants.

The nearby wetlands also provide a crucial habitat for a diverse range of flora and fauna, all of which will be affected by the expansion of an intense cattle feedlot in such close proximity.

## 3. Adverse environmental impacts

This development has potential to impact the environmental value of groundwater on the site through release of contaminants. The site is poorly located for the proposed construction as it's not only located within the Burnett drainage basin, but drains into the GBRMP, increasing the risk of impacting valuable surface waters.

Additionally, the site is located within the Great Artesian Basin and much of the land is subject to occasional flooding during high rainfall. In fact, the areas that are proposed for effluent utilisation are located in areas that are subject to total inundation during extreme weather events.



An extreme weather event with heavy rainfall - which are becoming more frequent as a result of climate change, would cause the property to be inundated with resulting runoff from solid waste and effluent utilisation areas containing organic and mineralised manure constituents to flow into the waterways. This could cause a significant pollution event and ecological hazard. Even more concerning is the threat of an effluent holding pond spill as a result of high rainfall, which would result in catastrophic damage to the water system causing widespread pollution, death of aquatic animals and potentially impacting human health. The risks and impacts are extreme based on the evidenced history and potential consequences.

#### **4. Lack of regard for animal welfare**

The majority of Australians are becoming more and more concerned about animal welfare, and the fact that welfare has not been considered in this application means that it does not align with community expectations. According to a [survey report](#) prepared for the Australian Government, 95% of respondents viewed farm animal welfare with concern, and 91% want reform. The general public have increasing apprehension around factory farming due to the serious animal welfare issues.

The applicant has specified that the provision of shade is not a consideration at this time, due to the breeds of cattle they intend on having in the feedlot. This feedlot will frequently reach temperatures in excess of 30 degrees, and be prone to extreme weather events, and the cattle will

have absolutely no shade or shelter. The Animal Care and Protection Act 2001 (ACPA)<sup>3</sup> specifies that:

*18 (2) Without limiting subsection (1), a person is taken to be cruel to an animal if the person does any of the following to the animal—*

*((f) **confines** or transports it—*

*(i) **without** appropriate preparation, including, for example, appropriate food, rest, **shelter** or water;*

Whilst industry codes of practice overwrite core parts of the the ACPA, and therefore provision of shade or shelter is not a legal requirement for feedlot animals, the industry's peak body, the Australian Lotfeeders Association<sup>4</sup>, as well as Meat & Livestock Australia both strongly encourage the provision of shade for feedlot animals. New development applications that don't adhere to this basic level of animal welfare should not be approved.

## **5. Lack of consultation with Traditional Land Owners**

It is disappointing that there appears to have been no consultation with traditional land owners about this development. The lands of Three Moon Creek and the Burnett Basin have been important to Aboriginal people for thousands of years. Many Aboriginal nations retain a connection with the region, and their history, culture and livelihoods are closely intertwined with its river systems.

At the very least, the Wakka and Wulli People should be recognised as a key Stakeholder and be offered the opportunity for consultation.

## **6. Established significant community concerns relating to factory farming**

There is increasing anxiety within the community about climate change, and younger generations are starting to take action against the human rights breaches made by governments approving environmentally destructive developments. A landmark judgment<sup>5</sup> earlier this year ruled that the Federal Environment Minister has a duty of care to protect young people from the physical harm resulting from climate change.

The Lowy Institute's Climate Poll 2021<sup>6</sup> found that the majority of Australians believe that global warming is a serious and pressing problem and that we should begin taking steps now, even if this involves significant costs.

In 2018, the Department of Agriculture and Water Resources commissioned Futureye<sup>7</sup> to identify expectations of farm animal welfare from the community. The report found that the Australian

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<sup>3</sup> Page 23 - <https://www.legislation.qld.gov.au/view/pdf/2016-07-01/act-2001-064>

<sup>4</sup> <https://www.feedlots.com.au/shade>

<sup>5</sup> Probono Australia, "In a landmark judgment, the Federal Court found the environment minister has a duty of care to young people"

<https://probonoaustralia.com.au/news/2021/05/in-a-landmark-judgment-the-federal-court-found-the-environment-minister-has-a-duty-of-care-to-young-people/>

<sup>6</sup> Lowy Institute Climate Poll 2021 <https://www.lowyinstitute.org/publications/climatepoll-2021>

<sup>7</sup> Futureye, Australia's Shifting Mindset on Farm Animal Welfare

<https://www.outbreak.gov.au/sites/default/files/documents/farm-animal-welfare.pdf>

public's view on how farm animals should be treated has advanced to the point where they expect to see more effective regulation. In Australia, 95% of people view farm animal welfare as a concern with 91% wanting at least some reform to address this.

60% of respondents either agreed or strongly agreed with the statement 'Factory (or intensive) farming is indefensible', 77% of the respondents either agreed or strongly agreed that 'Animals should have freedom to express normal behaviour' and 81% said that they were concerned about factory farming.

The North Burnett Regional Council has a responsibility to seriously consider these broader public concerns when making decisions that will impact many Australians, not just those within the North Burnett Regional Council region.

## **7. Summary and conclusion**

This development poses a high level of risk to endangered wildlife, vegetation and the wider ecosystem as a whole. The nearby wetlands provide a vital habitat for aquatic animals, birds and plant life, including critically endangered species, and it is imperative that the council does not approve developments that cannot assure the protection of areas of ecological significance.

Rather than approving new or expanding factory farms, we urge the North Burnett Regional Council to encourage and support sustainable ventures that work in harmony with the environment and align with social expectations, enrich the region, and thereby improve the health and wellbeing of all community members.

**Thank you for reading and considering my objection to DA210040. For the reasons outlined above, I request that North Burnett Regional Council, as consent authority, refuse the application for an intensive 1,450 standard cattle unit factory farm feedlot.**

Please do not hesitate to contact me if you require further information or clarification.

Yours sincerely,

*Amanda Holly*

Amanda Holly  
Campaign Manager  
for and on behalf of Animal Liberation Queensland

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**Phone:** (07) 3255 9572

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Re: Development Application Permit for Material Change of use for “Intensive Animal Industry” (Beef Cattle Feedlot). 326 Downies Rd., Three Moon. Lot 52 & Lot 53 RW 103 (Council ref: DA210040).

## SUBMISSION

It is our submission that Council should consider this application very carefully, with the long term footprint of a feedlot in the area uppermost in their minds. The properties in the vicinity are relatively small and may impact many.

Firstly we would like to express our disappointment at not being notified of this proposal. I understand that Downies Rd./old railway corridor may be considered adjoining, however the proximity of our property boundary and the entrance of this proposed development is very close indeed, it negates the possibility of building a house there if the development goes ahead.

It's hard to trust the accuracy of the report when photographs 15 and 16 are wrong and Lot 39 RW 103 vegetation described as open grassland (few trees, long grass) with all other surrounding Lots crops only (no effective tree cover) this also incorrect. This is a very wordy application, taking many pages to say not much at all. Trying to wade through it to find relevant information very time consuming and sometimes appearing contradictory. Understanding the meaning of the relevant information – what's the difference between M17 Moderate and L5 Low in the Risk Levels before and after mitigation. During a high rainfall event will the effluent find its way to our stockwater dams on Lot 39 RW 103? If we had more time maybe we could do research to be better informed.

Our place of residence, 446 Downies Rd., is right on the road and currently dust is a huge issue, let alone having an intensive animal industry just up the road. We have seen that access to this development should be from the other direction, but if not?... (Who enforces this and what are the consequences of breaching this condition? Would bitumen in front of our residence be considered?)

It is councils decision whether or not to approve the Material Change of Use for this property, we would just like it noted we have concerns.

Russell and Phyllis Schimke  
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28<sup>th</sup> January, 2022.