



Submitting Supplementary Objection - Amended DA

Addressed and sent via post or email:

Wagga Wagga City Council, PO Box 20, WAGGA WAGGA NSW 2650
council@wagga.nsw.gov.au

Reference: DA23/0598 Eringoarrah Pty Ltd Livestock Processing Industry – Abattoir

Timing: Prior to **26/09/2024**

Grounds for objecting - Key issues remain despite Amended DA

You could simply say something like, you are providing the following supplementary grounds for objecting, to be read in conjunction with your original objection.

Please write **in your words** your reasons. The list below provides a guide (**do not submit this document**). If you could advise lynne.wallace@bigpond.com you have submitted, it would help.

Environmental

Surface Water

- the un-consented feedlot continues not to be included and remains un-assessed
- the feedlots 8% slope exceeds best practice of 2.5-4% slope considerably and would provide significant runoff velocity and possible entrainment of manure in rain events
- manure entrained in runoff is directed via a contour to the dams on the north side of the site, also un-assessed, which then overflow to the flood plain
- the dams on the north side of the site also currently capture leaching from silage pits located above the dams and would capture flooding through the proposed abattoir buildings as modelled by Martens in the Amended DA

Groundwater

- continue to ignore existence of closest neighbour's bore
- groundwater elevation from constructed test bores indicate they are connected to the neighbour's bore, and this is not assessed
- Amended DA has not considered the groundwater gradient, sub-catchment size, recharge, or testing and monitoring of groundwater in the flood plain immediately below the proposed site

Waste water/effluent treatment

- the proposed Hydroflux system cannot treat total dissolved solids (TDS) e.g salts
- the Hydroflux report states, *"It is understood that Okeview is intended to negotiate with the EPA on the TDS limit, thus no treatment for TDS has been included. Treatment of TDS will require the use of a reverse osmosis (RO) system, which is both costly to install and operate, and is not appropriate for this use case."*
- and contradictorily to this, Martens Supplementary Groundwater Assessment states, *"Treated abattoir effluent to be irrigated at sustainable rates which avoid nutrient or salt overloading."*

Site investigation

- does not follow relevant guidelines and legislation under NSW EPA and State Environmental Planning Policy
- does not follow the Wagga Wagga City Council Contaminated Land Management Policy

Planning

Abattoir use and expansion

- the chiller rail for 60 head is proposed to be used once per week. Most abattoirs use for 5 days per week, so this latent capacity could increase throughput to 300 head per week or 15,600 per annum, or by 500%
- this would increase the environmental load proportionally

Feedlot use and expansion

- it seems unlikely that the proponents will leave the abattoir idle in times of drought when they are unable to finish cattle to kill on grass
- most likely they will operate the feedlot for production to ensure the abattoir keeps operating so they can keep processing their stock and consistently supply end users
- the feedlot has the capacity to supply in excess of 60 head of cattle per week, at up to 140 days on feed, on a continuous basis
- therefore, there is likely to be ongoing and at times increased environmental impact from the feedlots operation which remains un-assessed

Biosecurity

- no biosecurity plan is submitted
- Amended DA LUCRA report states *“There is little discussion on biosecurity measures to be implemented at the proposed development, save for a small piece in the Operational Management Plan (Martens, 2023f).”*

Animal Welfare

- the proponents state they cannot consider an alternative site at the Bomen Special Activation Precinct (industrial development area, which includes existing Teys abattoir) 20km away, for animal welfare transport reasons and, yet, they plan to transport cattle from their other properties as far away as Scone, about 600km
- if this is the case, an Animal Welfare Plan should be included in the DA to ensure the welfare of the cattle being trucked to justify their own standards and the exclusion of Bomen as an alternative site

LUCRA report Amended DA (Land Use Conflict Risk Assessment)

- makes no assessment of consented Farm Tourism DA on neighbouring property to the north
- only partially assesses the consented Rural (hobby farm) Subdivision DA to the west and inaccurately claims it as lapsed

Consultation

Agreements

- it was agreed at the Oura consultation meeting that the proponents would include the feedlot in the survey area of the EIS, this was not done
- ORP also wrote to the proponent after the meeting confirming this and further requesting that the feedlot be included in the project area of the EIS, this letter was ignored

Neighbours

- the position of all neighbours does not seem to be accurate which mischaracterised the majority as being supportive of the proposal when it would seem the majority of neighbours are not supportive

Roads and Traffic

No Amended DA reports

- issues with concerns of holiday timing of traffic surveys not addressed
- inaccuracies of vision and safety distances at the Oura Road entrance to the proposed site not addressed
- the use of unrelated intersection on the Sturt Highway and the ignoring of the closest intersection of the Oura Road and the Oura village not addressed

Bushfire

The Amended DA report has corrected the incorrect location listings for the proposal of the Mid North Coast and the Lower Hunter, however, the risk to the community and neighbours remain unchanged

- volunteer fire fighters being put at risk from industrial fire exposure
- the risk of thermal runaway of batteries during periods listed as extreme or catastrophic fire risk
- lack of assessment and growing community awareness that solar factories are fire ignition points, more than previously reported