

EPA Victoria
GPO Box 4395
Melbourne Victoria 3001



Greater Shepparton City Council
Locked Bag 1000
Shepparton VIC, 3632

Dear Sir/Madam,

Comments on Section 22(1) notice to provide further information by Meatworks Australia Pty Ltd - development at 630 Lancaster -Mooroopna Rd. Gillieston & 1100 Mulcahy Rd, Gillieston.

EPA Work's Approval Application: 1003441

Thank you for the opportunity to provide comment on the information provided by Meatworks P/L (Meatworks) in their Section 22(1) response published 29th August on the EPA Engage website. We provide the following comments:

Period to Make Further Comment

Initially the length of time specified by EPA for submitters to make further comment on Meatworks response was restricted to 7 days. The Meatworks response is a detailed response of 40+ pages and contains new and updated information including: an additional explanation from Professor Wilks regarding zoonotic disease, additional information from the odour assessment consultant "Air Noise Environment" and what appears to be updated plans together with further explanatory information on various aspects of the project which have been included throughout the document.

Given this we considered the initial 7 day deadline was unreasonable and would have been difficult for any submitter to respond to (if they choose to provide comment). I am grateful the EPA saw fit to review the deadline and extend it from 7 to 21 days which has provided a reasonable and fair opportunity for submitters to make further comment. It is regrettable it took a number of emails and follow up phone calls for EPA to agree to extend the timeframe.

We would recommend in future when determining a suitable timeframe that EPA considers reviewing its works approval process to include a reasonableness test? While submitters may have a strong interest in the information they are generally working folk with other responsibilities and most often unable to outsource their response to a third party. In our view, given the size and scope of the development, a reasonable person would have assessed a timeframe of 7 days to be inadequate and at least 14 days should have been given.

Planning Matters

From further discussions with EPA we understand objections regarding planning aspects are unable to be addressed under the section 22(1). Given this was both a GSCC and EPA process we respectfully request GSCC now consider if further information is required

as per section 54 of the Planning and Environment Act. Many of the objections are related to risks associated with planning and it is foreseeable that some may feel resentful that Meatworks has not responded to these matters in their document.

Given the approval process is a dual one which has provided opportunities for the two agencies to streamline their processes we have taken the opportunity to provide our further comments relating to the responses on planning matters in this document which we will forward to both agencies.

Zoonotic Disease and the Risk to Residents

We are appreciative of Professor Wilks further information on Biosecurity and Animal Disease risks in the section 22 response but are even more concerned that much of his original risk assessment and further assessment is predicated on a facility which only processes lambs.

Throughout the EPA works application (not including appendices) there are 83 references to sheep -

- *"The new facility is designed to process up to 3000 head/day of sheep"*
- *"Meatworks Australia propose to establish a new export sheep processing facility"*

We feel it is highly plausible that additional sheep will be processed at this facility and that given the right business conditions sheep (rather than lambs) or goats may become the dominant animals processed. The processing of goats and sheep featured heavily in Meatworks promotion of the development and is still included in their website:

<https://meatworksaustralia.wordpress.com/> and promotional brochure.

We assume that the relevant permits (planning permit, a successful EPA WA or the Primesafe / DEWR license) will not distinguish between species (lambs as opposed to sheep or hoggets) and if this is the case the decision about which type of animal to process will be at management's discretion. Meatworks may choose to expand or alter the operation to include livestock which have a much higher zoonotic disease burden. If this is the case our concerns about the disease risks and in particular Q Fever are greater. Nonetheless a large number of sheep will be processed at this facility (Professor Wilks indicates 5% which equates to over 40,000 sheep per annum).

We feel the risk to nearby residents and my family, particularly in relation to Q-Fever from sheep or goats carrying the *C. burnettii* bacteria (Q Fever bacteria), is significant. When lodging my initial objection I was not aware of the risks of this illness but have since reviewed information provided by the NSW Department of Health and other state health departments which indicate: "People living nearby high risk industries" may be at higher risk from contracting Q Fever through exposure to contaminated dust and aerosols.

Professor Wilks has completed his qualitative risk assessment and claims the facility presents a low risk to nearby residents. He reiterates this in his further advice but I am concerned this risk is understated for the following reasons:

- Infection rate - Advice from health agencies including the NSW Health Department and the respective Victorian and Queensland Health Departments indicates Q Fever is a disease with relatively low mortality but high morbidity. It is a serious

notifiable disease. In Victoria the current infection rate is 0.7 per 100,000 people (as at 8 September) and has a similar infection rate to measles (even with its widespread community vaccination program).

The 0.7 infection rate takes the entire population of the state into account (some 5.5+ million people). Currently the number of Q Fever infections notified to Dept. of Health for 2019 number: 27 (1 Jan – 8 Sept). The total number for 2018, 2017 and 2016 was: 31, 22 & 49 respectively. This is many more than the 15 cases Professor Wilks claims in the zoonotic diseases report in Appendix Q of the EPA WAA.

http://www.health.vic.gov.au/ideas/downloads/daily_reports/rptVS_SNIDSVictorianSummary_GR.pdf

Most Victorians live and work in Melbourne or another urban centre well away from any reservoir of risk. This indicates to me the real rate for persons living in a rural area would be far higher than 0.7. The risk is even higher for persons living in proximity of a high risk industry. Abattoirs and saleyards are specifically referenced in the various department of health fact sheets which place those living nearby at greater risk of contracting this disease. Additionally Q fever is prone to be misdiagnosed because of its common flu like symptoms and hence considered to be under reported to the relevant health agencies.

- Lambs versus Sheep - Professor Wilks' follow up information refers to the facility as a lamb only processing facility and assesses the risk of Q Fever in the context of lambs only. He does not assess the risks to residents from the processing of sheep or goats. At its most conservative Meatworks have indicated at least a few hundred sheep will be processed but I would argue the numbers are likely to be much greater. The sourcing of lambs, sheep and goats from non Q Fever areas in the south eastern states will largely be a matter of management discretion and probably cannot be enforced as a condition of license. If this is the case the risk control i.e. Using only lambs sourced from areas not endemic to Q-Fever cannot be considered to be a strong control and competes against other risks like economic viability and the need to find a reliable source of livestock when supply is scarce. If this occurs this will likely cause Meatworks to source livestock from further afield into Northern NSW and Queensland where Q fever infected stock are endemic.
- Vaccination - In Professor Wilks original WAA report (Appendix Q) he indicates that one of the best risk mitigation measures against Q Fever is to vaccinate persons working or living in areas surrounding sites such as a meatworks where large number of sheep are processed. There is no indication in the Meatworks application that residents living nearby the facility will be vaccinated against Q Fever. This places this vulnerable group at greater risk of being exposed to Q fever in dust particles and aerosols generated from the facility. In addition many local residents have families with young children (we have two children under the age of 15) which are unable to be vaccinated. So while Meatworks propose to vaccinate all of their employees (including their families), transporters and contractors (including the laundry workers where uniforms will be laundered), [for what Professor Wilks considers to be a low risk already], neighbouring residents will not be afforded that protection. It will be up to the discretion of each resident to

assess the risk for themselves and seek to be vaccinated. In my view this does not represent either a low or acceptable level of risk.

- Q fever in dust particles – my reading on Q fever indicates it can travel long distances on dust and aerosol particles. Significant outbreaks of Q Fever in the Netherlands (refer to the Nucheve VCAT hearing) resulted in hundreds of residents becoming infected up to 5km away from a goat dairy. The nearest residents to the proposed facility are around 500m away and hence are at greater risk of contracting Q Fever through breathing in contaminated dust and aerosols.

I have read the air modelling report and can find no reference to dust monitoring. Its entire focus is on odour (which in my opinion is still a significant issue) but it appears no dust modelling has been performed.

In our view if there is a lack of evidence or full scientific certainty about infected dust particles and how far they can travel we should fall back on the precautionary principle when considering this aspect of the risk – in our view Meatworks have not done this.

- Sources of Dust and the Dust Management Plan - Professor Wilks indicates in order to mitigate for Q fever that dust should be managed. He indicates (Q.5) those activities where dust may be an issue at the facility and that the likelihood of infectious dust or aerosols leaving the property to be “unlikely” (under normal operating procedures). Professor Wilks indicates in Q.3 he has taken a precautionary approach when allocating a rating to Likelihood and Consequences but it would seem to me that if this risk and others have only been assessed under normal operating conditions the assessment cannot be considered to be taking a precautionary approach and that if a precautionary approach was taken it would have considered unusual conditions and operational upsets which can be experienced by any facility from time to time increasing the likelihood and or consequence of the risk.

There appear to be a number of dust or aerosol sources Professor Wilks has not considered when completing his risk assessment these include:

- The covered pens will be 2.5m above the ground and although the area underneath will be bunded by a 300mm high it will not be fully enclosed. This provides an opportunity for dust particles to become airborne in manure as well as aerosols in animal urine.
- The daily collection and cleaning by bobcat of manure and urine from beneath the covered pens presents an increased risk of aerosol and dust particles becoming airborne. The transport by bobcat of manure in an open front end loader or similar to manure shed.
- Overflow yards designed to be used on weekends and or 1-2 days per week will be clay lined which can cause infected dust to become airborne. While Meatworks claim the overflow yard will be used sparingly (1 – 2 days per week cannot be considered to be sparingly but rather are an essential part of the businesses day to day operation) I am concerned the yards could be

used much more frequently and even daily. The frequency of use is a matter of management discretion.

Activity and Separation Distance

In our view the Meatworks section 22(1) response did not address our concerns regarding buffer distances for the following reasons:

Unlike an abattoir located in an urban industrial zone which is likely to have access to existing reticulated waste management infrastructure Meatworks will be required develop and maintain a system to manage its own industrial waste.

The effective processing of industrial abattoir waste is essential to the viability of the operation and should not be considered as separate to other abattoir activities. The recycling of industrial waste water to surrounding land is a key activity and considerable planning has gone into ensuring this is carried out safely but it is not without risks including generating odour to surrounding residents and the degradation of the soil from salinity and sodicity.

In regards to air quality it is our view that all activities associated with managing the industrial waste must be considered when determining a suitable buffer for this project. Meatworks reiterate a buffer distance is only required from the main facility area to sensitive receptors and cites method 2 and its explanatory diagram in the section 22 response, however this fails to recognise any odour that will be generated from the irrigation of the industrial waste to land surrounding the building complex. In Meatworks response they indicate that once processed there will be very little odour from the industrial waste (page 8). To me very little odour does not mean no odour. Throughout other parts of the response Meatworks indicate the recycling of the industrial waste water will have no odour but there is no evidence to validate this claim.

From time to time it is probable there will be operational upsets where poorly treated industrial waste is released mistakenly for recycling before being it is processed, or where the shanding of waste is not managed correctly. In our view these are the reasons why the buffer zone must include the waste recycling (irrigation) areas and why the buffer zone calculation must consider these activities and any areas where the activities take place. EPA indicate in their 1518 guideline that “even with good pollution control technology and practice, there may still be unintended emissions which must be anticipated and allowed for”.

Our view is these activities and others need to be considered as activities a per EPA 1518 and hence the buffer zone measurement should be drawn by including a polygon which includes both the facility complex, the industrial waste management facility and the transport routes within the property.

In our view while Meatworks have used the correct method to calculate the buffer zone (although we feel the rural method discriminates against folk living in a rural area and forces them to accept a greater degree of risk than should be considered reasonable), unfortunately they haven't included all activities relevant to the operation in their polygon calculation. They have assumed the recycling of industrial waste is not relevant in determining the correct buffer distance.

Planning Threshold Distances

Meatworks identified in their original WAA information (7.2.4 – snip below) the need to comply with threshold distances under the Greater Shepparton Planning Scheme, clause 53.10 (clause 52.10 referenced in Meatworks document is a blank page without content).

7.2.4 Greater Shepparton Shire Council Threshold Distances

Clause 52.10 of the GSSC planning scheme indicates the following “threshold distances” for “Uses with Adverse Amenity Potential”, which are relevant to the MAPL development:

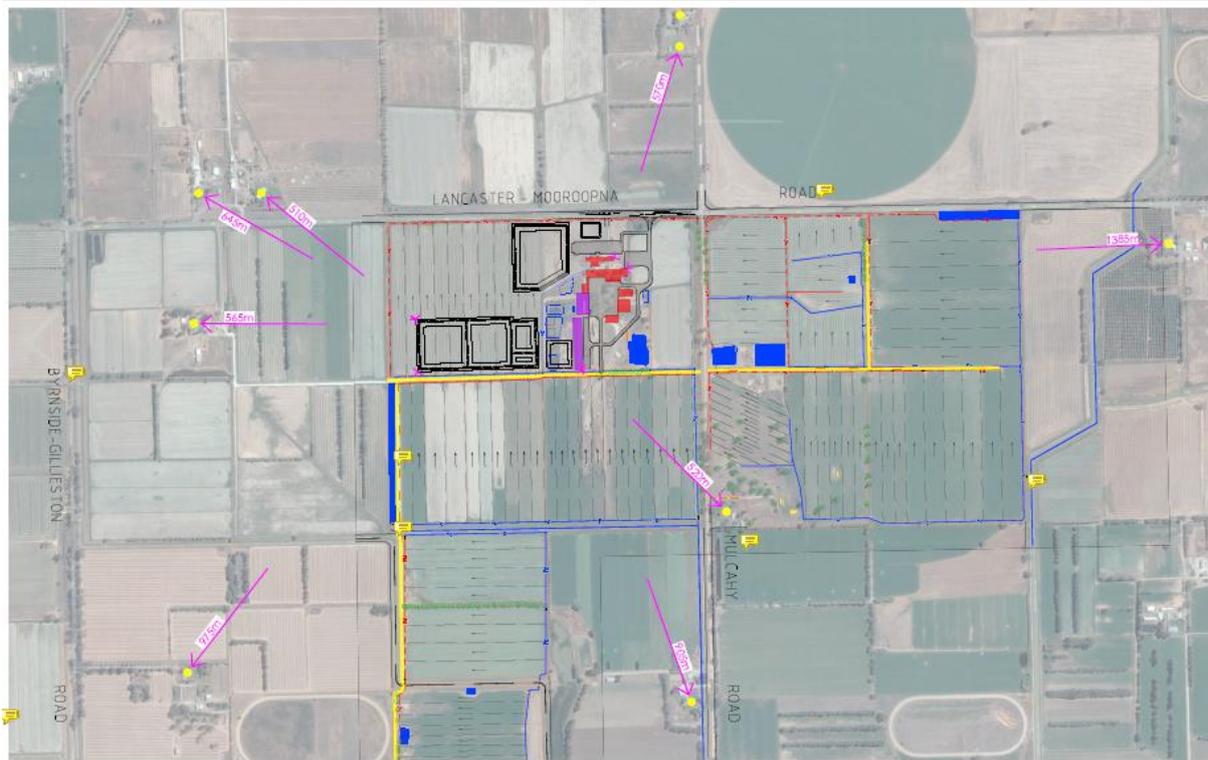
- Abattoirs: 500m
- Treatment of aqueous waste: 200m.

Under the planning scheme threshold distances are usually measured from source boundary to receptor boundary. There are no private houses within these threshold distances as shown in [Figure 2845 P15](#).

Our interpretation of this clause is that it prescribes threshold distances for uses with adverse amenity potential and specifies a distance of 500m for an abattoir and 200m for the management of aqueous waste (the industrial waste management facility). I take it at face value the separation distances measured by Meatworks to receptors meet the 500m but examining Figure 2845 P15 which maps the receptors (see snip below) shows that these distances can only be achieved (to the North, North West, West and South East) by calculating the distance through the land of a neighbouring landholder. If the broader definition is applied where “the threshold distance is calculated as the minimum distance from ANY part of the land of the proposed use or building”... as it states in clause 53.10 the threshold distances can only be achieved by calculating these distances and relying to a much greater extent on the neighbouring landholder.

We do not agree this is fair and reasonable for the following reasons –

- The threshold distance and buffer will prejudice the neighbouring landholder by potentially restricting their future and lawful use of the land;
- Through no cause of their own the argument of reverse amenity could be used against the landholder where they propose a future use of the land that is not compatible with the abattoir and which is subsequently refused on the grounds it may be impacted on by the abattoir and its operation.
- Neighbouring landholders are inadvertently and without consent or agreement being asked to assist to manage the risk of adverse amenity associated with this development.
- The value of neighbouring land is likely to be reduced on account of this risk and the restrictions the threshold distances impose.



Other Matters

In our view the following items in our original objection were not adequately responded to in Meatworks Section 22(1) response:

- Meatworks have not addressed our concerns relating to risks associated with operation creep. They have not given a guarantee rendering, processing of blood products and disposal of paunch will not be carried out at this site for the life of the facility.
- Meatworks have not addressed our concerns relating to increased shifts and the flow on risks this causes in all aspects of the operation.
- Meatworks have not provided any additional information relating to our concerns regarding the noise level from sheep awaiting processing, being penned overnight or on weekend in the elevated pens and / or holding yard.
- No further information has been provided by Meatworks on our concerns regarding their inexperience and the potential for increased risks.
- No further information has been provided by Meatworks to allay our concerns regarding the risks associated with traffic noise associated with large numbers of vehicles entering the site in the very early morning hours.

Conclusion

In summary we continue to consider this proposal / application poses significant risks to neighbouring landholders and residents and while the Meatworks section 22(1) has addressed some of our concerns others have not been addressed.

Yours faithfully

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