

Greater Shepparton City Council
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EPA Victoria
GPO Box 4395
Melbourne Victoria 3001

Dear Sir/Madam,

Objection to Proposed Meatworks Australia development at 630 Lancaster -Mooroopna rd. Gillieston & 1100 Mulcahy Road, Gillieston.

GSCC Application Number 2018-218
EPA Transaction Number No: 1003441

Thank you for the opportunity to comment on the proposed development and the associated planning application to the Greater Shepparton City Council and EPA works application. This is our formal submission.

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We feel the large number of documents and appendices in both applications (running to some 650+ pages) has taken a long time to read and understand. A project like this takes many years to design which is evident in the applications but it is unfortunate residents have not been given more time to consider them in more detail before responding (if they choose to). The statutory timeframe is very short and we have only become aware of the proposal in the article of the 28th May 2019 edition of the Country News, before this we were completely unaware of the proposal.

Notwithstanding this we would like to take this opportunity to formally object to the Meatworks Australia application and offer the following grounds for objection:

Proposed Project is out of Character

This area of the Goulburn valley has been dedicated to farming pursuits since at least the beginning of the last century. It is predominantly made up of small to medium size dairy farms, with a number of horticultural enterprises in between. Although farms have become consolidated over the years the area is still a dairying community. There are no large scale industrial manufacturing and processing facilities in the Gillieston or Undera areas and so this project is of particular significance and concern to us.

We moved to our farm 13 years ago to get away from the urban sprawl and enjoy the clear, wide and open spaces which complemented our rural ideal and lifestyle. Although not from traditional farming backgrounds we appreciated the challenge of establishing our own farming enterprise and continue to enjoy all of the benefits rural living has to offer. We feel this project puts this at risk and is strongly out of character for the area.

Currently the property (as does our own) is zoned as a Farm Zone (FZ) and requires permit approval for a range of alternative uses including as an abattoir. We feel this proposal is at odds with the purpose of the farm zone as it is intended. We feel the farm zone should be used primarily for agricultural use and that its retention for agricultural purposes should be encouraged. A large scale industrial facility of this type is not in keeping with the zone's purpose or landscape which is surrounded by small to medium farming enterprises. We are concerned this would be out of character for the area and outside the spirit of the zone as it is prescribed.

As the topography of the Goulburn Valley is extremely flat any project of considerable size will be seen from a fair distance. There are generally no hills with which to mask or hide a facility of this type. We accept farm type buildings are to be expected in the landscape but believe the farm zone and the area is not the place for large industrial scale factories.

We feel the project would be better situated in an industrial zone where there is ready access to existing and proven water and waste water management infrastructure and which would provide opportunities for employment to those living closer to the facility without the need to travel long distances. Tatura already has a successfully operating abattoir which is located within the town boundary and which is supported by existing water and waste water infrastructure.

Options Analysis – WWTP

We have concerns the options analysis used to choose the most appropriate method to process waste from the plant has not fully considered the other alternatives. For a project of this size and scale we are concerned the process selection relied on a qualitative interpretation and on what was considered to exist commonly across the industry. The ETS report indicates BOD to be 1200Mg/L average but could be as high as 2500 mg/L. We are concerned the system chosen was based on the average BOD loads and did not take into consideration the higher loads which could be expected when the plant is operating outside its normal range due to process and operation upsets. We are concerned if loads are outside the average range the waste management system will become overloaded causing significant and ongoing odour issues for neighbouring residences.

In order to better understanding the underlying odour risk we would like some further information relating to the relative effectiveness of each of the systems assessed including – anaerobic and SBR both individually (without aerobic) as well as combined with aerobic and facultative lagoon systems.

Noise, Lighting and Odour

We have concerns the level of noise, lighting and odour that will be generated from the manufacturing facility will have an impact on our amenity and liveability.

Noise - The application indicates up to 1000 sheep will be unloaded and penned overnight. The noise from these activities together with truck movements, sheep

dogs and other yarding noises are concerning and in particular when these activities take place on very still nights when noise carries much further distances than during daylight hours. We are also concerned the activity will take place on weekends (and in particular Sundays). The proposal indicates trucks will be unloaded overnight in readiness for processing which will commence at 0500. The proposal indicates more sheep will be unloaded and penned over the weekend when the factory is not processing on Sunday. This is when the overflow yarding will be used. We are worried this will create additional noise over the weekend when we are at home.

The application indicates two shifts will operate. The first will commence at 0500 where 50 or so operators will travel to work at 0440 - 0430 Monday to Saturday. While the total number of vehicles movements has been assessed as acceptable we believe this number of vehicles travelling and entering the site at this very early hour will cause significant noise for surrounding residents.

Odour – an onsite waste management facility will accept up to 130ML per year of waste generated from the plant and associated processes. We do not accept odours will be contained within the boundary of the site on all occasions and the 2013 modelling data indicates this is the case. In particular we are concerned during temperature inversion events and on days of poor air dispersion odour will linger, become more concentrated and drift across to neighbouring properties.

We would be keen to see an analysis of the aerator lagoon option and the extent of odour generation where one or more aerators is not operating for any length of time due to poor management practices, power loss or mechanical breakdown. How far and in what direction would odours travel under these scenarios?

Lighting – as the facility will operate 24 hours per day (in some capacity) it is likely to be lit up like a Christmas Tree causing it to be seen from a far distance. We feel this will affect the amenity and liveability of the surrounding district and anywhere where there is a direct line of site to the facility.

Contingency and Emergency Planning

We are concerned about increased risks of noise and odour from non-normal operations caused by breakdown and or emergency situations and in particular the following:

- Power failure and its impact on lagoon aeration and the creation of odour;
- What happens if a lagoon “turns” or becomes affected by blue green algae creating additional odours;
- Mistaken release of waste water for irrigation which has not been adequately processed or shandied causing additional odour;
- The need to irrigate during winter or on overcast or rainy days and the creation of odour from this activity;
- Mechanical breakdown and or poor maintenance of aerators and or other plant and equipment and the creation of additional noise and odours;
- Flooding which may lead to lagoon overtopping and the need for emergency discharges and the increased risk of odours from and contamination of GMW drainage systems or roadside table drains.

Congestion and Traffic

The report on traffic management for the site indicated the additional loads travelling to and from the facility along the Lancaster – Mooroopna Rd would be acceptable. We believe it brings with it additional and unwanted noise and in particular noise generated in the very early hours of the morning caused by unloading trucks and employees traveling to site for the first shift Monday – Saturday (between 0400 – 0430).

Lagoon Desludging

We are concerned lagoon desludging (which will be required sometime in the future) could lead to the generation of significant odours from the site. Can the operators / owners give a %100 guarantee odours from this activity will not leave the site boundary?

Operation Creep

We are concerned that although rendering, processing of blood products and the disposal of paunch will initially be taken off site for processing the facility may expand its operation to include these processes sometime in the future. We feel this will cause further odour and noise issues from the facility and an increased load on the wastewater management facility. Can the operators / owners provide a 100% guarantee these processes will not be considered at this site for the life of the facility?

Increased production

While the application proposes two shifts per day, Monday through to Saturday, 0500 - 2200 we are concerned over time a third shift may be introduced creating additional noise during the night time hours (over and above those activities taking place at night), and the potential for odours from increasing loads on the waste water management facility with an increased risk of odour outside the property boundary.

Start Up Risk

We are concerned additional odour may be generated from the start up and seeding of the waste water lagoons. We are unsure what measures would be implemented to mitigate this and the risk of odour leaving the property boundary during the commissioning and start-up phase. We are also unsure how long this phase will last and whether this would be days, weeks or months.

Objection on Animal Cruelty Grounds

We understand processing at this facility has been designed to provide for Halal certified sheep meat and that slaughtering will be carried out to comply with religious requirements. We seek further information on the finer detail of the process and in particular the type of stunning that will be used on the animals. We would advocate for irreversible stunning rather than partial stunning due to the risk of animals regaining consciousness prior to bleeding out and death. From an animal welfare perspective this is the best practice approach. We would vehemently object to any facility which seeks to be exempted from pre-slaughter stunning requirements on the grounds of religious reasons.

Inexperienced Operators

It concerns us that this facility will be operated by the EI Group and Meatworks Australia as their first venture into the abattoir industry and that additional risks may arise due to their inexperience. The Directors do not indicate they have any experience in operating an abattoir / slaughterhouse / meatworks of any type in Victoria or interstate or a waste management facility or irrigated property. They seem to be primarily based in Melbourne

and we are concerned that if they expect to have hands on involvement on a day to day basis they may not fully appreciate the risks with operating a facility of this type and scale and any consequential risks to surrounding landholders and residents.

Conclusion

In summary we believe this proposal / application poses significant risks to neighbouring landholders and residents. We do not believe the factory / facility is appropriate for the site proposed and is not in keeping with the purpose of the Farm Zone. We feel there are significant risks to us and our neighbours that would be considered to be unacceptable affecting our amenity and liveability and we appeal to the GSCC Councillors and the EPA to reject the permit and licence application(s) on these grounds.

We respectfully request to be notified in writing if the works approval/licence and or planning permit is issued.

Yours faithfully

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