

Theme 1

Site Selection and Land Use Zoning

- Permanent loss of very productive agricultural land
- Intensive farming on rural living zone
- Not appropriate for this site – takes up the size of 10 MCG's

- Concerns over Site Selection
 - not against farm – just location
 - location to Port of Portland – hardwood/woodchip exporting port
 - unacceptable to construct a facility of this size and industry in an area surrounded by existing residences

- Concerns over Land Use Zoning
 - contradicts the Glenelg Shire Council's draft guidelines to its Rural Land Strategy
 - planning a factory in the middle of a Rural Living Zone is ludicrous and makes no sense
 - residents on the seaside of Dutton Way are restricted on what they can build – *Why isn't this?*
 - zoning forbids 'intensive animal husbandry'
 - zoning allows for agriculture which 'does not adversely affect the amenity of surrounding land uses'
 - pipes transverse Public Park and Recreation Zone
 - altering of planning laws to exclude aquaculture from 'intensive animal husbandry' – no consultation with residents of Dutton Way and surrounds
 - environmental protection overlay in Planning Scheme has been ignored in the proposal
 - Rural Living Zone to use means PEOPLE living, not millions of abalone living
 - proposal does not represent the objectives of the Local Planning Provision Framework
 - Rural Living Zone key purposes are not supported – 'provide for residential use' / 'agricultural land uses which do not adversely affect the amenity of surrounding land uses' / 'to protect and enhance the natural resources, biodiversity and landscape and heritage values of the area'

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Theme 2

Noise and Odour (page 1)

- Abalone farm is an industry with all the hallmarks of such..... noise and smells
- Site and local area is currently serene, quiet and peaceful
- Landscape provides natural amphitheatre – acoustics of low-level valley and steep ridge
- Noise, vibration and odour will affect our amenity, lifestyle and health
- Independent study is needed

- Concerns over construction noise impacts
 - 4 years - will cause a lot of disturbance and affect amenity – sources including heavy machinery, traffic, people
 - would like to see the additional noise mitigation measures proposed in the construction management plan

- Concerns over operational noise effects
 - multiple large pumps, coolers, transport and workers will result in adverse impacts on sleep patterns and amenity (lots of shift workers in Portland)
 - this is a massive proposal no matter how the pumps and generators are housed there will still cause noise & vibration
 - real probability of noise nose-compliance on a regular basis
 - noise model does not accurately include contribution of all noise sources and/or low frequency noise
 - difficult to assess construction impacts when the methods are not fixed

- Concerns over the adequacy of the Noise Assessment
 - incorrectly considers the whole site and surrounding area as “Major Urban Area” and assessed against SEPP-N1 as opposed to NIRV which is the appropriate policy for the area south of the proposal (including the Henty Bay Beachfront Holiday Park)
 - background noise levels used not accurately representing real conditions, “surf noise” not always present
 - does not consider all sensitive receptors such as residents and visitors at the Henty Bay Beachfront Holiday Park (noting that many of the users of the park will be in tents without any noise attenuation normally received by houses)
 - *How can Yumbah verify its claims of meeting all noise and EPA standard when there is no comparative facility?*
 - *What tests have been done to replicate the noise & vibration levels of such a large operation? Is there comparative data from an equally large operation?*
 - *What decibels will be generated? How much noise will be generated?*
 - *What can be done if it's too noisy at night?*
 - effects of environmental noise on human health/welfare and wildlife
 - some of the predicted noise levels frequently exceed the recommended night time and event criteria
 - proposed noise monitoring does not include residents along the ridgeline nor along the boundary with the Henty Bay Beachfront Holiday Park
 - best practice has not been applied

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Theme 2

Noise and Odour (page 2)

- Concerns over potential vibration effects
 - adverse impacts of vibration not considered
 - vibration impact on land and house movement. *How will this be controlled?*
 - does not consider all sensitive receptors such as residents and visitors at the Henty Bay Beachfront Holiday Park (noting that many of the users of the park will be in tents without any noise attenuation normally received by houses)
 - constant humming from pumps/motors during operation
 - *Is there proof that vibrations from the pumps will NOT be felt by surrounding residents, whales and animals?*
 - *How will it be monitored?*
- Concerns over potential odour generation and effects
 - foul smelling, abhorrent smell, terrible stench
 - existing abalone farm at Narrawong smells
 - undertaking only one site visit to identify odour sources and levels is inadequate
 - comparison with Narrawong and the assertion that no odour complaints implies that everything is okay - this is flawed as there are no residents as close to Narrawong as there are at Nyamat
 - this proposal is significantly larger than Narrawong. *What tests have been done to assess the levels of odours and their potential impact off-site? If Narrawong can't meet the 'no offensive odours beyond the site boundary' how will this much larger proposal comply? Without modelling how can council and EPA be sure there won't be any impact?*
 - odour sources include: dead abalone, fish feed, settlement/effluent ponds
 - no disposal plan for sludge. *How will the dead abalone and sludge be managed, treated and disposed of? How can you ensure no smell will be noticed?*
 - odours from settling ponds will not be compatible with a residential zone
 - odours will attract flies and scavenging birds, impractical to cover ponds to prevent birds
 - odour assessment has not considered many adjoining residential properties including: Henty Bay Beachfront Holiday Park
 - Independent study and modelling is required
 - no or very limited buffer zones - distances from settling ponds less than 50m
 - south-easterly winds will make it worse
 - abalone mortalities and associated odours are highest in the summer when there is a larger number of residents and visitors to the area
- Concerns over separation distances
 - rationale used in the assessment is wrong - proposal should be considered seafood processing which has a defined separation distance
 - inadequate separation distances with no buffers. *What happens if something goes wrong, that is what buffers are for but there are no buffers proposed here?*

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Theme 3

Marine Ecology and Whales

- Concerns over potential effects on marine ecology
 - destruction of/changes to the marine environment (existing reefs, seagrass beds and beach) through the laying of pipes, intake of water and discharge of effluent
 - freshwater (stormwater) will be discharge onto a sensitive reef (Minerva Reef)
 - Minerva reef has a wild abalone population
 - pumping of water from the bay and effluent back in will affect the marine environment, especially whales, leafy sea dragons, seals, burrowing crayfish, corals, crustaceans
 - inlet and outlet pipes might attract sharks
 - warmer water will be discharged back into the Bay. *What effect will that have on the marine ecosystem?* Concern over the potential for invasive species to take hold especially from visiting ships to the port
 - impacts to marine life from the inlet pipes, vacuum effect and direct contact
 - independent study needed to examine the effects of the pumps and pipes on habitat loss/disruption to marine life
- Concerns over potential effects on cetaceans
 - near shore environment off Dutton Way is a recognised Southern Right Whale (SRW) nursery and one of the best places to see and photograph the whales. Southern right whales are an [critically] endangered species. SRWs, Humpback Whales and dolphins have all been seen where the inlet pipes are proposed to be located
 - no real data on the effect that the pumps, inlet and outlet pipes and associated noise will have on the whales. *What testing has been done on the pipe and vibration impacts to the whales?*
 - the pipes will reverberate noise and vibration - whales and other marine mammals, dolphins and seals are particularly sensitive to noise and vibrations. *What guarantees can be provided that the whales won't be affected?*
 - whales are only just returning to these waters. *Will they continue to return?*
 - save the whales!
 - *Who is assessing the impact on the whales?*
 - *How will the whales be affected?*
 - independent study needed to examine the effects of the pumps and pipes on the whales

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Theme 4

Dust Generation and Health Effects

- Concerns over Dust Generation
 - contamination of rain water tanks – one of the main water sources for residents
 - strong north-east winds will mean that dust generated during construction will make it worse
 - length of construction period and volume of earth works
- Concerns over Health Effects
 - site is mainly sand which is known to contain silica – inhaling fine divided crystalline silica is toxic and can lead to severe inflammation of the lung tissue, silicosis, bronchitis, lung cancer, and systemic autoimmune diseases, such as lupus and rheumatoid arthritis.
 - independent study (open and scientifically verifiable) is needed to establish silica content of sand to be disturbed and pulverised along with the potential for toxic particles to be released into the air
 - use of anaesthetics during operation – 2 phenoxyethanol – known to cause adverse side effects including eye and skin irritation, hypotension, damage to the central nervous system – with repeated long-term exposure causing organ damage
 - contamination of rain water tanks from increased bird activity associated with settling ponds – including dust generation
 - dust storm asthma due to the removal and levelling of tonnes of earth
 - long-term environmental noise exposure and odour altering amenity and well-being

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Theme 5

Socio-economics (Job Creation, Tourism, Recreation)

- Concerns over Job Creation
 - guarantee that locals and local contractors will be given preference for jobs and contracts
 - will create negative economic impact through bad publicity
 - questions around the number of full-time staff – opportunities in abalone facilities often go to overseas visa holders
 - confirmation on job numbers – 160 jobs created but approximately 100 staff employed on a full time basis – *Is this permanent or casual?*
- Concerns over Tourism
 - loss of income for tourist accommodation businesses including Caravan Parks and holiday rentals
 - will affect the tourism 'boom' which has occurred following the return of whales to the area
 - alteration to Frank Lodge Lookout
 - Dutton Way Caravan park is within 100m of the eastern boundary, with Henty Bay Beachfront Holiday Park directly opposite the south east boundary
 - devaluation of the Great South West Walk – *one of the most amazing experiences the Glenelg Shire offers both locals and tourists*
 - *increase in tourism since cruise ships commenced – this will risk everything!*
- Concerns over Recreation
 - recreational activities (including: swimming, fishing, jogging, road cyclists, hikers on the Great South-West Walk) prevented during construction and operation
 - location of pipes will prevent marine craft from accessing certain areas – causing an issue for anglers
 - loss of public access to beach due to pipe shore crossings – one of the few beaches with access for disabled people
 - exclusion zones around pipes will be a public safety issue

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Theme 6

Effluent Discharge and Biosecurity

- Concerns over Effluent Discharge
 - effect that recycled water will have on marine life
 - waste and chemicals generated will go straight into the ocean
 - 1,100kg of abalone faeces discharged per day
 - vast amounts of water will be pumped in and out – 8886 litres of seawater sucked up per second – 173 Olympic sized pools released per day (432 million litres per day)
 - *How is the sand taken away from the ocean floor for the farm returned to the sea?*
 - amount of water intake and size of pumps will not allow enough time for the sediment to settle and therefore it will go straight back out to sea
 - *How can there be 20 inlet pipes and the amount of water being pumped in daily, but only 8 outlet pipes?*
 - *How long will it take EPA to respond to a complaint?* – but if it is pollution it will be too late
 - *What is the impact of extracting and returning large amounts of water to the ocean?*
 - high probability that the huge volumes of water travelling from deeper intake pipes through shallow troughs and open sediment ponds will result in increased water temperature of outflow
 - large volume of stormwater (freshwater) being disposed of upon a sensitive reef ecosystem (Minerva Reef)
 - public safety in relation to swimming – contaminants from outlet pipes
 - outlet water will be contaminated with mollusc effluent, manufactured feed, cleaning chemicals and ‘chemical medicines’
- Concerns over Biosecurity
 - susceptible to devastating marine sourced disease
 - threat to wild abalone stocks and fishing through viruses
 - no guarantee that a virus outbreak like the previous one will not occur again

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Theme 7

Hydrogeology and Water Table

- Concerns over Hydrogeology
 - residents in the area have previously been advised that the land must not to be disturbed or bear structures
 - no mention of drainage – stormwater regularly floods the site – *Where will this go?*
 - comprehensive hydrogeological study needs to be undertaken – completed by an independent reporter
 - once the surface is effectively sealed with concrete – *What are the consequences to groundwater and surface waters?*
 - *What will be the effect on houses when the surrounding land dries out?*
 - Presence of acid sulphate soils – leakage of sulphuric acid into groundwater
- Concerns over Water Table
 - in some areas water table is no more than 90cm below the surface, and lies under a white stone layer of approximately 8-10 metres
 - major ground disturbance of a large area that has a documented very high-water table
 - residents in the area rely on bores – *How will disturbance effect these?*
 - Shire's frequent call outs to drain water from Dutton Way is evidence of the high water table
 - Were told that sewage system was required as septic tanks were leaching into the freshwater table – *What affect will this proposal have on the water table?*
 - erosion and damage to nearby properties from drainage of water table
 - changes to the natural flood cause – *Will this cause flooding for residents on Dutton Way?*
 - reports that settlement pond sludge is buried onsite at Narrawong – *If this happens at Nyamat what effect will it have on water table?*

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Theme 8

Climate Change, Sea Level Rise, Coastal Erosion and Planning Restrictions

- Changes to beach – *Will sand stop coming from the East?*
- Combination of trenching and underground boring during installation of pipes is likely to affect the stability of the sensitive coastal subsurface
- Disturbance and erosion of sensitive coastal subsurface due to construction and pipeline installation
- Will sand by-passing continue at the current rate – *Can Port of Portland guarantee this?*
- Dr Black suggests that groynes (a barrier built out at sea) or offshore reefs are required to protect coastline at Dutton Way
- Protect properties from sea level rise through extension of sea wall and new groynes
- Impact on the Port of Portland's activities – particularly sand by-passing and any future dredging works or works within Portland Harbour
- Impact on quality of Dutton Way foreshore
- By the admission of Water Technology there could be some interference with the sand replenishing being blocked by these pipes causing sand to build up on the south/west side and not flow through to the north/east side causing erosion
- Beach will be checked twice a year to assess changes - *What are these? - What does the proposed 'beach nourishment' involve?*
- Site plans show deep blue water – but during low tide in summer the area is shallow and sand-disturbed
- Residents on the seaside of Dutton Way are restricted on what they can build – *Why isn't this?*
- Concerns with rock/sea wall removal
 - ocean inundation during removal of rock wall
 - risk of seawater contaminating the low-level water table
 - damage to existing residences
 - currently there is no plan for protection whilst the wall is removed

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Theme 9

Visual and Landscape Amenity

- Massive dimensions (takes up the size of 10 MCG's) would alter irrevocable the landscape in which it is proposed to be built, and will destroy a coastal plain that is one of the last green, non-industrial areas in Portland
- Limited information on the impact on neighbouring amenity during the 4-year construction period
- Impacts to ocean views
- Unsightly pipes leading out to sea
- Beach pollution
 - Seaweed/kelp/algae build up at Narrawong site
 - Rubbish on beach at Narrawong site
- Artificial lighting pollution at night – intensive floodlighting
- Potential for glare from large solar array facing directly into some properties
- Existing shared farm style fences replaced with security fences of much greater height and fitted with an electric wire
- Inability to screen from main farm structures and feed silos – planned tree planting will take years to grow to height
- Shade cloth and other soft materials unsuitable in high winds
- Areas of black plastic with 5800 solar panels
- Untidy / unsightly site – similar issues seen at Narrawong
- Negative sensory impact to residents within the immediate area and across the bay to Portland

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Theme 10

Other (page 1)

- Shade mesh is a fire hazard – this is not compliant with a Bushfire Attack Zone
- Large solar panels not enough to run site – further power will be needed – *What will the effect on residents be?*
- Privacy of residents – employees can see straight into some home
- No access to report from Aboriginal Victoria
- *What are Yumbah's future expansion plans?*
- Increase in greenhouse gas emissions
- Construction of road will interfere with the ground structure across/along the natural ridge line and may cause erosion or land slip
- Cliff face is already unstable – risk of collapse from heavy trucks during construction

- Concerns over vermin and pests
 - odour from settlement ponds will attract flies
 - feed storage and spillage will increase vermin
 - snakes and rodents attracted to wastes – shell, mortalities and meat

- Concerns over terrestrial flora and fauna
 - 2-day flora and fauna assessment is not adequate
 - Loss of Koala habitat

- Concerns over financial assurance
 - remediation of land if project fails
 - derelict site through financial ruin
 - no 'exit plan' – *What guarantee do we have that the proposers would return the land to its current state if they withdraw from the project*

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Theme 10

Other (page 2)

- Concerns over traffic and roads
 - 100+ vehicles a day using internal road 24 hours a day – passing by houses
 - damage to roads during construction and pipe installation causing a cost burden to rate payers
 - risk to family vehicles sharing narrow winding roads with B-double trucks
 - danger to residents, children, cyclists and hikers
 - safety of school children using school bus
 - increase in collisions and potential fatalities with increased traffic
- Concerns over property devaluation and rates
 - ongoing cost to rate payers to rectify damage to rock wall, erosion of beach and coastal land
 - future market value of properties
 - land and property values cut in half

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