

To EPA re Works Approval Application ref no 1003316

By Yumbah Aquaculture Narrawong Vic.

[REDACTED]  
upon Yumbahs response to stakeholders responses and also upon Yumbah Work Approval Application as received by the EPA.

1. A. Air Quality issues, the massive size of industrial earthworks as proposed by Yumbah works over about 150 acres will create severe dust and aerial contamination for workers and people resident adjacent and nearby to their proposed works. Also most people adjacent to the proposed works rely on rain water tanks for drinking, ablution and gardens, contamination of their tank water will be inevitable by the works proposal. Yumbahs statement that there is no risk to air quality is absurd, nonsense and illogical. Solution is to grant works approval for large earth works well away from residential human habitat.
2. Odour cannot be controlled offsite with a feedlot for animals closely assembled for growth purposes. This is why all feedlotting and intensive animal growth facilities are universally located well away from human habitation zones. The EPA and Glenelg Shire will be very aware of the isolated locations of existing animal feedlots around the Portland region. Duttonway is a nonsensical location for a feedlot of the proposed magnitude for any farmed animals. Solution is to locate a feedlot for Yumbah well away from adjacent human habitation, Yumbah have chosen well with their Snapper Rd. location, there is their location for further expansion.
3. Biosecurity and Disease, there are two abalone feedlots in the Portland region and one of these was responsible for infecting wild abalone fish stocks with viral ganglioneuritis disease about 15 years ago, severely depleting biomass and virtually destroying the wild abalone harvesting industry around Vic. Southwest coast. This was a criminal activity that Yumbah

states will in likelihood be almost certain. This statement is a political comment designed to induce mental acceptance of a diseased abalone industry. It is not conducive to intelligent industry management by Australian authority upon marine harvesting business activity.

4. Water Quality, A. Land based facilities. Yumbah proposes to pump extraordinary volumes of sea water (Yumbahs own data) onto a land feedlot site to facilitate growth of abalone. It is a patent absurdity that Yumbah state there is no risk of saline water incursion into the very shallow fresh water table that exists at Duttonway. Given that Yumbahs water containment methods involve 10,000 cubic meters of concrete and unstated quantities of plastic with numerous piping and pondage, it is inevitable that saline water will damage the fresh watertable given that concrete and plastic fracture and pumping supply often exceeds maximum volumes in industrial scenarios and operator mistakes leaving hoses and taps on. Such is human nature, Solution is to locate Yumbahs proposal well away from Duttonway.

B. Yumbah sludge management practices as proposed and historically are not acceptable, contamination of land watertables with nitrates ammonia faeces chemicals and unused feed nutrients is inevitable at the Duttonway site. EPA cannot accept poor handling practices of contaminants removed from seawater prior to refuse seawater being returned to the Henty Bay. Strict Australian law across three tiers of governance strictly forbid the injecting of refuse water into watertables, seawater, lakes and rivers.

5. Huge volumes of pumped water daily will impact upon air quality at Duttonway, increases in humidity will impact upon human residences and cause changes unforeseen in the microclimate locally causing discomfort health issues and possible increases in aerial fogging in this tourist area.

The massive pondage of water proposed will attract large quantities of birds, noise issues as well as wild bird entrapment are problems that Yumbah have not foreseen. Solution is for Yumbah to relocate elsewhere away from Duttonway.

6. Australian Aquaculture elsewhere pay diversion fees around \$5 to \$10 per megaliter for water used in their business activities eg troutfarms , all business pay a reinjection fee for refuse water returned to habitat and face serious criminal penalty for non compliance. Ground water license fees for pumped water for agricultural purpose are between \$5 to \$10 per megaliter. If Yumbah business modelling does not include this future likelihood of between \$1 to \$3 million dollars payment annually of water royalty fee to governance or EPA or waterboards ancillaries, then Yumbahs proposal for works approval will be regarded by EPA as economically inadequate. Two issues are raised, A. EPA will need to instruct local shire governance on future needs in this seawater fee issue and B. the 3 tiers of Australian governance need to address this issue as Australia is a sea bound nation and we share borders internationally too. Other pumped liquids apart from seawater are industrially exploited and incur various fees, excise, royalty eg gas, oil, freshwater etc. so for seawater to be exempt is a profound tax anomaly. Ownership of seawater is a profound legal issue, best possible guidance available would be from marine seacage fisheries, oyster and mussel beds and from prawnfarming too.
7. Noise and vibration will be a very significant pollution factor for the proposed Duttonway site, it will be impossible to run large pumps at high volumes with zero problems detectable by Henty Bay users and by adjacent residents. Solution is to relocate expanded premise elsewhere away from Duttonway.

8. Tourism. Duttonway is a renown tourist location and for Yumbah to assert otherwise is patently absurd, adjacent to proposed land are two caravan parks.
9. Massively Built Industrial Site as proposed will use around 10,000 cubic meters of concrete and unnumbered kilometres of plastic sealers and plumbing, this is a seriously large industrial development and is totally inappropriate for the proposed Duttonway location. Solution is to translocate the Yumbah works application to a more suitable and isolated site well away from existing residential homes and tourism.
10. Local Aborigines have utilised freshwater springs on the Duttonway foreshore for thousands of years, this works application threatens the salinity quality of the freshwater table closely underground. This threat cannot be allowed.
11. EPA Works Application proposals are self vested business interests expressing their own opinions with purchased expertise and data and much effort involving corporate largesse and political influence, both the EPA and the Glenelg Shire must make proper decisions upon good and bad ideas and to do so rationally and intelligently for both local residential people and for industry too. EPA needs to assist the Glenelg Shire to help Yumbah expand their current Snapper Rd Narrawong site so as to enable Yumbah to expand their business to the massive world class capacity as proposed. Yumbahs proposal has merit within a more isolated and less sensitive area such as Narrawong or Tyrendarra regions where the industrial development will be welcomed by their local people with miniscule resentment expressed. Duttonway is the wrong location for Yumbah to expand their abalone feedlot industry.

