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DELWP

Sustainable animal industries submission

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My submission is relevant to Action 12 in relation to **Intensive Poultry farming**.

- Action 12 – Develop clear guidance to improve the quality of planning permit applications, and develop model permit conditions to guide local government.

Waste is my key aspect of concern with regulation under the following Acts:

- Environmental and Amenity:
 - *Catchment and Land Protection Act 1994*
 - *Environment Protection Act 1970 - State Environment Protection Policy*
 - *Public Health and Wellbeing Act 2008*
- Animal biosecurity:
 - *Livestock Disease Control Act 1994*

As a background, my local government council (Wellington Shire Gippsland) has supported numerous intensive broiler farms all on the west end of their council boundary. The one closest to our family farm property (2km) was challenged in VCAT with the 2016 decision in favour of the proponent to operate a 720,000 chicken broiler farm in Toongabbie. [file:///C:/Users/A660/Downloads/VCAT-Decision%20\(2\).pdf](file:///C:/Users/A660/Downloads/VCAT-Decision%20(2).pdf)

What is of concern is that local landholders have been consistently led to believe that they will be able to access raw litter to receive cheap manure to fertilize their farms once the farm is operational. This would mean any farm outside of a broiler operation could have registered contractors offload the raw manure without an appropriate framework to manage it.

The question I requested the Barrister to ask at VCAT was for **Council to put conditions on waste** that surrounding farms could not receive raw non-composted litter in support of our right to not have our amenity further impacted and to prevent potential biosecurity risks. I was disappointed that in the official ruling, this issue was not addressed.

The Wellington Shire Planner was very adamant that **'they could not manage that, it was not their problem and it was a farmer's [surrounding] right to be able to access cheap manure if they wanted it.'**

When the **current** broiler farms are in operation locally there will be over 1.5 million broilers on a 6-8 weekly cycle producing an indeterminate amount of raw litter that needs to be disposed of.

In an area that has significant waterways all flowing into the Ramsar listed Gippsland Lakes system already regularly impacted by blue-green algae, a higher concentrate of excess phosphorus and nitrogen will further deteriorate water quality and impact biodiversity.

As noted in Environment Management Plans, intensive broiler farms are not allowed to stockpile the raw litter due to odour, dust and biosecurity risk so who is responsible for it once it leaves the farm gate.

If the Government want clear regulation, foresight needs to be applied so both the proponent and the affected community can proceed forward on a clear understanding that amenity impacts related to SEPPS will be followed for obvious reasons and the objectives of **Clause 12 Environmental and Landscape Values** are followed to prevent nutrient rich leaching and/or runoff into environmentally sensitive waterways.

12.01-1 Protection of biodiversity which states (in part) that:

Planning should help to protect the health of ecological systems and the biodiversity they support (including ecosystems, habitats, species and genetic diversity) and conserve areas with identified environmental and landscape values.

How hard would it be for model permit conditions to include that all waste be collected by a registered contractor and taken to a registered waste receiver.

The upcoming Code of Practice review is assuming that a licenced and registered contractor will remove the waste under policy guidelines but there is **no legal weight behind a CoP** as noted with the current Broiler Code and there is evidence from other intensive broiler operations that this is a loophole that is exploited. Local government turning a blind eye to the dumping of raw litter is to make a mockery of the Environment Management Plan that all proponents must fill in upon permit application.

I note in the recent ***Animal Industries Advisory Committee report*** that they do not deem litter to be a risk but for what amount and at what stage of composting is litter not a risk.

I also note the **2015 Audition Generals (VAGO) Report on Bio-security.**

Here are a couple of paragraphs from the summary of findings:

“This audit found Victoria's livestock biosecurity system to have been weakened by a decline in financial and staff resourcing. While this is consistent with a wider government initiative to achieve greater resourcing and operational efficiency, in effect it reduced DEDJTR's on-ground capacity to detect an exotic livestock disease outbreak before it spreads and becomes established.

Ultimately these trends place the future of the state's substantial livestock industries and their economic potential at greater risk. Even in the absence of a significant disease outbreak, shortfalls in frontline biosecurity resources can limit the state's ability to demonstrate its livestock health status.”

If broiler farms are allowed to offload manure who manages the risk of composting, nutrient load, dust, spread and/or outbreak of disease.

All comes down to regulation which is management via a suitable framework that currently does not exist.

Clearly, The VAGO report into livestock bio-security show it's an area of neglect and it is this area that needs reform and improvements so other farming enterprises and our health are not put in jeopardy. **Control the waste and you prevent the problem.**

Uncontrolled management of raw poultry litter disposal can unwittingly transfer disease from property to property.

This is an issue for the Victoria Farmers Federation and other peak bodies like Dairy Australia and the MLA as well as Catchment Management Authorities, the EPA and Dept of Health.

With a huge growth in intensive poultry farms expected, waste will now be problematic into the future and has created a grey area needing further consideration and management.

However, in ***Appendix H – proposed model permit conditions***, if the **Responsible Authorities are not interested** in ensuring waste is managed as per legislative requirements, who protects our amenity and that of our environmental biodiversity.

There is a gap in what should happen with poultry waste and, in reality, what does happen with it. Authorities don't always act to be responsible.

An example of how local government and co-regularly agencies allow this loophole to continue is with the Central Goldfields Council 'allowing' raw un-composted chicken waste litter from Strathlea Broiler Farm to be stockpiled on surrounding farms.

The resultant increased amenity impacts and added bio-security risks are why model conditions should be included in permit conditions.

If Central Goldfields Council allows dumping of raw non-composted chicken litter outside of farm gate, does that mean the same dumping will be allowed to occur in my community?

The following photos from Strathlea have previously been presented to EPA.



Photos of stockpile in property on Clarkes Rd 8th March 2012



Photos of stockpile in property on Clarkes Rd 14th October 2013



Photos of stockpile on property in Clarkes Rd 30th October 2013

Photos of stockpile on property in Clarkes Rd 21st November 2013



The photo left was taken 16th January 2014 and shows what appear to be fresh piles of waste on the broiler property near the Unit 1.