

DPI advises that this proposal appears likely to have potential implications for food safety and biosecurity from the recycled wastewater generated from the poultry processing facility, and has the following comments.

#### *Compliance and Integrity Systems (Food Safety)*

In relation to the food safety components of these operations, all water used in the production of food for human consumption must be potable. This standard would need to be supported by mandated testing requirements, for both town supplied water and water treated/recycled by the facility to be compliant.

#### *NSW Food Authority*

In the absence of the Hunter & New England Health comments, and further to comments made by Compliance and Integrity Systems:

- NSW Food Authority supports in principle the development of water saving technologies
- The operation of the water recycling plant must be included in the site's food safety program,
- Baiada must confirm that the recycled water will be suitable if proposed to be used in the spin wash and spin chill stages of the Oakburn plant's process.

#### Background:

- In August 2018, the Science and Operations Unit in the NSW Food Authority participated in a meeting with Baiada and Hydroflux about installing a water recycling plant at the Baiada Beresfield plant.
- Hydroflux is a consulting company that develops and installs water recycling equipment. Hydroflux is the same company whose material is included in the documents in the link for the proposed new Baiada Oakburn facility near Tamworth.
- In follow-up correspondence to Baiada about the Beresfield proposal, NSW Food Authority noted in principle support for water saving measures; highlighted the requirement for Baiada to include the operation of the water recycling plant in the site's food safety program; and asked Baiada to confirm that the recycled water had been confirmed to be suitable for use in the spin wash and spin chill stages of the Beresfield plant's process.
- Biosecurity & Food Safety have not heard from Baiada about the Beresfield proposal since.
- Biosecurity & Food Safety have not made a thorough comparison, but the Water Treatment Plant proposal for the Baiada Oakburn factory appears similar to the one presented for Beresfield, however it is assumed the Beresfield project did not proceed.

PFAS impacts was considered and it has been determined that this would not be relevant to the birds unless they were being placed on the ground to feed before being transferred to the processing facility - NSW Food Authority have assumed that they would be transported to the facility and taken directly to processing.

Process water sources might need to be considered because of known PFAS contamination in the area near Tamworth Airport.

#### *Animal Biosecurity*

There are a number of notifiable bacteria and viruses in poultry that can be isolated from the respiratory excretions, faeces or organs of affected birds. These include highly pathogenic avian influenza virus, virulent Newcastle Disease virus, Salmonella enteritidis, Salmonella gallinarum and Salmonella pullorum. Many of the notifiable diseases of poultry in NSW have

zoonotic potential and can potentially be spread to humans via contaminated poultry products.

DPI strongly recommends that the proponent address the risk of spreading the causative agents of notifiable diseases of poultry through the use of the proposed wastewater treatments at the planned Baiada Oakburn Poultry Processing Facility.

1. Will the processing plant be producing poultry meat for human consumption? If so, what is the maximum risk vs the residual risk of spreading zoonotic pathogens to human consumers?
2. Will the recycled water be used to wash poultry transport vehicles? If so, what is the maximum risk vs residual risk of contaminating these vehicles and spreading notifiable pathogens to farms where broiler chickens are grown?