



DOC22/1096177-38

The Proper Officer
Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Attention: Jeffrey Peng
Planning and Assessment Division

15 February 2022

Dear Jeffery

**State Significant Development SSD 13855453
Request for comment - Grenfell Poultry Breeder Farm**

Thank you for providing the NSW Environment Protection Authority (EPA) with the opportunity to provide comment on the Environmental Impact Statement (EIS) for the proposed Grenfell Poultry Breeder Farm for Baiada Properties Pty Ltd at 1130 Gooloogong Road, Grenfell NSW 2810 (SSD-13855453; the Project).

The EPA has reviewed the EIS for the Project and understands that the proposal is for:

- Construction of 40 poultry sheds across 4 separate farms for breeding and rearing chickens. Each farm will house a maximum of 140,140 birds (maximum capacity of 560,560 birds site wide)
- Ancillary buildings and supporting infrastructure. These include manager residences, storage facilities, amenities blocks, cool rooms, egg packing facilities, water tanks and other services; and
- Access roads

Based on the information provided, the proposal is subject to an Environment Protection Licence (EPL) under sections 43, 47, and 55 of the *Protection of the Environment Operations Act 1997* (POEO Act). The Proponent will require an EPL for *Bird accommodation and Livestock intensive activities* under Schedule 1 of the POEO Act.

The EPA has reviewed the EIS and provides detailed comments in **Attachment 1** for your consideration.

If you have any questions regarding this matter, please contact Mrs Samantha Hayes on (02) 6333 3806 or via e-mail at info@epa.nsw.gov.au .

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Carlie Armstrong'.

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ATTACHMENT 1: DETAILED COMMENTS FROM REVIEW OF EIS

AIR QUALITY AND ODOUR:

Odour Model Uncertainty

The Odour and Dust Assessment has modelled the four farms of 10 sheds each being stocked at day 1 of the calendar year. The modelling has assumed that a two-year period was simulated within a single year. However, it is unknown if this modelled bird placement regime results in the maximum odour emissions coinciding with the worst case meteorological conditions, which would represent worst-case odour impacts.

Although the proposed breeder/rearing farm will have a longer stocking regime than broiler farms, the odour modelling should include additional scenarios to ensure the prediction of worst-case odour impacts. These additional scenarios should assume a suitable offset period to account for variability of emissions and to model odour impacts over a greater set of meteorological conditions. The offset used to model broiler farms (i.e. 2 weeks) may not be suitable for breeder farms and the offset used should be adequately justified.

The EPA recommends that the proponent revises the modelling to include additional scenarios with offset stocking start dates to capture worst case impacts. Adequate justification for the assumed offset stocking dates must be provided.

Odour Risk and Additional Mitigation Measures Not Provided

Modelling of odour impacts in the Odour and Dust Assessment predicts less than 4 odour units (OU) at the nearest receptor. However, there is significant variability of odour emissions from the activities and only a limited staged stocking regime is modelled. These issues combined with the inherent uncertainty in odour modelling means the results presented do not provide for adequate evaluation of impacts and that no offensive odour beyond the boundary will occur.

Compliance with the odour criterion is just one tool to indicate acceptable impacts. Demonstrating an understanding of the odour risk of the proposal enables further evaluation of the potential for odour impacts from the proposal. It is important for the proponent to understand the odour risk of their project as it is the proponent's responsibility to comply with Section 129 of the POEO Act.

Further, a facility with no contingency measures is a high-risk project compared to a facility which does have contingency measures that could be implemented if odour becomes an issue. Section 6.2 of the *Technical Framework – Assessment and management of odour from stationary sources in NSW* lists the information required to determine likely acceptability of odour impacts and includes the additional feasible mitigation measures that could be implemented if odour issues occur or if surrounding land use changes.

The EPA recommends the proponent evaluates the odour risk of the activities and identifies additional reasonable and feasible mitigation and controls that could be applied should odour become an issue once the facility is operational. Consideration should be given to section 129 of the POEO Act concerning control of “offensive odour”.

Dust Management

The EPA considers that the Project has the potential to cause dust emissions. This can be mitigated through adhering to best management practice and maintaining good housekeeping in accordance with relevant guidelines.

The Proponent is recommended to implement all reasonable and feasible measures to proactively minimise dust emissions from the premises, including but not limited to access roads during both construction and operation.

WATER AND WASTEWATER:

The EIS considers water impacts and associated management procedures for both construction and operation.

Construction

The EPA acknowledges that a suite of sediment and erosion control measures are discussed in the EIS, including the installation of a series of sediment basins to capture stormwater runoff during construction. The EPA reminds the Proponent that appropriate sediment and erosion controls must be in place prior to the commencement of construction activities and adapted as required as the project progresses.

Detail on the capacity, sizing, design rain event, catchment and management of the sediment basins are not provided. The EPA reminds the proponent that it is an offence under section 120 of the POEO Act to pollute any waters. The project is unlikely to include a license to discharge to waters. In that regard, the proponent must ensure that any discharges to waters meet ambient water quality or the Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZG 2018). This includes Total Suspended Solids and any pollutants that might be present during construction.

The EPA requires further information on the capacity, sizing, design rain event, catchment, and management of the sediment basins

Operation

The Proponent identifies that during operations stormwater runoff from the Premises will be managed via natural drainage which ultimately results in a discharge to waters. It is identified that water quality will be treated in accordance with the levels required by Weddin Shire Council and industry best management practice. It is unclear how the sediment basins installed during construction will be managed during operation, and whether any wastewater will be generated from activities relating to the cleaning out of sheds.

The EPA reminds you that it is a strict liability offence under section 120 of the POEO Act to pollute any waters. The Project is unlikely to include a license to discharge to waters. In that regard, the Proponent must ensure that any discharges to waters meet ambient water quality or the trigger values identified in ANZG 2018. This includes total suspended solids, nutrients such as total nitrogen, ammonia, total phosphorus, and any other pollutants that might be present from the Premises.

Where the water is unlikely to meet ambient water quality of the ANZG trigger values, the Proponent must look for alternative measures to manage the waters to avoid pollution of waters and protect the Water Quality Objectives for the receiving waters of Wallah Creek and Warranderry Creek. This may include, but need not be limited to consideration of:

1. Beneficial reuse opportunities such as irrigation or dust suppression
2. Installing appropriate clean water diversions to reduce the volumes of stormwater generated on the Premises
3. Implementing enhanced sediment and erosion controls to reduce the pollutants generated during wet weather
4. Capturing polluted stormwater onsite and managing appropriately to avoid a discharge to waters

The EPA requires further information regarding the management of waters during operation to avoid pollution of waters. Specifically, the EPA requires further information on:

- 1. The management of stormwater generated on the Premises to avoid pollution of waters, giving consideration to the above advice**
- 2. Details on any wastewater generated from cleaning activities including volume, quality, and management to avoid pollution of waters**
- 3. Details of the fate of sediment basins installed during construction after construction has ceased**

NOISE AND VIBRATION:

The Proposal identifies that some exceedances of the noise levels identified in the Interim Construction Noise Guidelines (ICNG) are expected during major construction. The Proponent identifies that nearby neighbours should accept some periods of high noise, considering the relatively short term nature of louder construction activities.

The EPA considers that all reasonable and feasible mitigation measures must be implemented to address these periods of excessive noise. Where noise levels cannot be achieved, the Proponent must consider effective stakeholder engagement, including but not limited to consideration of respite periods and alternative accommodation as appropriate.

WASTE MANAGEMENT

The Proponent identifies that waste will be managed in accordance with a Waste Management Plan during both construction and operation.

The EPA reminds the proponent that all waste must be classified in accordance with the NSW EPA's Waste Classification Guidelines and disposed of at a facility that can lawfully accept it.

CHEMICAL STORAGE

The Proponent identifies that there will be a range of chemicals stored at the Premises during operations.

The EPA recommends that all chemicals, including hydrocarbons, dangerous goods and other chemicals are bunded in accordance with relevant Australian Standards.

The EPA also recommends that the Proponent develops a procedure to maintain and monitor chemical storage areas to detect leakages and prevent spills. This procedure should include consideration of maintaining capacity within bunded areas following rain events.