

PEOPLE FOR
THE ETHICAL
TREATMENT
OF ANIMALS

Ania Dorocińska
Senior Environmental Assessment Officer
Department of Planning, Industry and Environment
New South Wales Government

10 February 2020

Via e-mail: Ania.Dorocinska@planning.nsw.gov.au

**Re: Baiada Integrated Poultry Processing Facility (Application
Number SSD-9394)**

Dear Ms Dorocińska,

I am writing on behalf of People for the Ethical Treatment of Animals (PETA) with regard to the proposal for the Baiada Integrated Poultry Processing Facility (application number SSD-9394).

Please see the attached submission outlining PETA's concerns in relation to the proposed facility.

Thank you in advance for reading the submission. We look forward to hearing from you regarding this matter.

Yours sincerely,

Laura Weyman-Jones
PETA Australia

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Affiliates

- PETA US
- PETA Asia
- PETA India
- PETA France
- PETA Germany
- PETA Netherlands
- PETA Foundation (UK)

Re: Planning Application Number SSD-9394

Dear Ms Dorocińska,

I'm writing on behalf of People for the Ethical Treatment of Animals (PETA) in relation to planning application SSD-9394, which seeks permission for the construction and operation of an integrated poultry-processing plant in Oakburn as an expansion of the current Baiada poultry-processing operation at Out Street, Tamworth.

We object to this proposal for the following reasons:

- It is proposed that up to 3 million birds would be slaughtered at this facility every week, triple the number currently killed at the Out Street plant. As noted in the environmental impact statement (EIS), the existing facility uses an average of 2 megalitres of water per processing day, and it is estimated that the proposed facility would consume up to 8 megalitres of potable water per processing day when operating at full capacity. Like much of New South Wales, Tamworth is in drought, and much of the area is currently subject to water restrictions.¹ In December 2019, the state government cut off the Peel River, which supplies water to Tamworth, in order to prevent the entire river from running dry.² This left five chicken farms – which supply the vast majority of poultry to Baiada's processing plants – without water,³ and judging by media reports, the issue seems to be as yet unresolved.⁴ Meanwhile, the EIS prepared by the applicant states that an additional 300 broiler sheds would be required in order to supply the new processing facility. Like all forms of animal agriculture, poultry farming is a thirsty industry, and planning to expand such operations in a town that's already so dry is senseless. Water is essential to life – eating chicken is not.
- The proposed facility would operate 24 hours a day, seven days a week. Because three times as many birds would be processed in the area, there would be extra traffic, which would not only put pressure on existing infrastructure but also increase noise pollution on the routes between chicken farms and the proposed processing plant. According to

¹Tamworth Regional Council. Water Restrictions.

<https://yourvoice.tamworth.nsw.gov.au/town-water-supplies/water-restrictions>.

²Alexander H. After two years without rain, this town sucked a river dry. *The Sydney Morning Herald*. 4 December 2019. <https://www.smh.com.au/national/nsw/after-two-years-without-rain-this-town-sucked-a-river-dry-20191203-p53gft.html>.

³Murphy J. Eggs in a new basket: TRC considers town water connection for chicken farms. *The Northern Daily Leader*. 8 January 2020.

<https://www.northerndailyleader.com.au/story/6572042/eggs-in-a-new-basket-trc-considers-town-water-connection-for-chicken-farms/>.

⁴Murphy J. Solution to Baiada poultry water woes could still be "months away". *The Northern Daily Leader*. 3 December 2019.

<https://www.northerndailyleader.com.au/story/6523504/solution-to-poultry-water-woes-could-still-be-months-away/>.

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Section 4.10.4 of the EIS, one of the busiest periods for traffic generation would be in the middle of the night, with up to 236 vehicle trips per hour between midnight and 1 am.

- Operations at the facility – as well as the chickens' waste and the bodies of dead chickens – would likely produce strong odours, which could disturb local residents and other businesses and have a negative impact on their quality of life. For years, Tamworth residents have complained of the smell of the existing Baiada facility.⁵ Expanding operations would mean exacerbating odour problems.
- According to Section 4.5.5.1 of the EIS, in order to construct the proposed development, approximately 0.83 hectares of Box-Gum Woodland and 0.51 hectares of planted native vegetation would be removed. Bushfires have already decimated the habitats of native species in New South Wales, and animals such as koalas and bats are moving outside their normal territories in search of shelter and food. Removing native vegetation from the area at this crucial time of ecosystem recovery could have negative consequences for koala populations, which are already in decline in the New England area.⁶
- The proposed facility does not align with the aims of the New England North West Regional Plan 2036,⁷ specifically goals 1, 2, and 4.
 - **Goal 1 – a strong and dynamic regional economy:** The word "dynamic" means "characterized by constant change, activity, or progress".⁸ Building another chicken-processing plant and potentially another 300 broiler sheds in an area that is already dominated by animal agriculture is just the opposite of dynamic.
 - **Goal 2 – a healthy environment with pristine waterways:** Expanding a facility that is so water-intensive during a time of drought is not consistent with responsible water use, let alone the maintenance of "pristine" waterways. Furthermore, the odour issues discussed above deny local residents a healthy environment.
 - **Goal 4 – attractive and thriving communities:** The proposed development is a very large structure and would have a significant impact on views of the local area. Few people would consider a poultry plant attractive, and owing to its proximity to Tamworth Airport, it would likely be one of the first and last things that visitors to the area would see and smell. Since operations would take place 24 hours a day, noise caused by truck movements to and from the plant in the early hours of the morning would have the potential to disrupt the sleep of local residents every day of the week.
- Finally, the facility would cause immense suffering to the chickens who would be slaughtered there at less than 2 months of age. Chickens are intelligent, social animals who can feel pain and distress. Last year, a PETA exposé of Baiada found widespread cruelty in its abattoir and breeding facility. Despite the presence of CCTV cameras at the abattoir, workers punched chickens in the head and bashed them against metal railings before shackling them by the legs. One worker told the eyewitness that he would "just start smashing birds". The eyewitness saw another worker repeatedly tearing birds' heads off – and even putting a severed head on his finger and wiggling it about like a finger puppet.⁹ In order to kill 3 million birds a week at the proposed facility, the slaughter line would be extremely fast-paced, meaning that many birds would still be conscious as their throats were slit and that workers would likely endure inhumane conditions.

⁵Rose A. Something is rotten – a fowl smell in the air. *The Northern Daily Leader*. 24 June 2014.

<https://www.northerndailyleader.com.au/story/2371167/something-is-rotten-a-fowl-smell-in-the-air/>.

⁶Murphy J. Inquiry comes to the "Koala capital" to investigate population decline. *The Land*. 11 December 2019.

<https://www.theland.com.au/story/6537127/another-declining-koala-population-under-the-spotlight/>.

⁷NSW Department of Planning, Industry and Environment. New England North West Regional Plan 2036.

<https://www.planning.nsw.gov.au/Plans-for-your-area/Regional-Plans/New-England-North-West>.

⁸Lexico. Dynamic. <https://www.lexico.com/definition/dynamic>.

⁹PETA. Exposed: Birds beaten at Australia's largest chicken producer. 2019. <https://www.peta.org.au/action/baiada-chicken-cruelty/>.

We hope you'll take our objections, along with the comments made by local residents, into account when making a decision on this application.

Yours sincerely,

Laura Weyman-Jones
PETA Australia