

Department of Planning, Industry and Environment
GPO Box 39
Sydney NSW 2001

Attention: Ania Dorocinska
Your Reference: SSD-9394

Dear Sir/Madam,

**TAMWORTH REGIONAL COUNCIL SUBMISSION - STATE SIGNIFICANT DEVELOPMENT -
BAIADA INTERGRATED POULTRY PROCESSING FACILITY - 1154 GUNNEDAH ROAD,
WESTDALE**

I refer to your correspondence received 23 July 2019 giving notice of the public exhibition of a state significant development, Baiada Oakburn Poultry Processing Plant (SSD-9394). Thank you for the opportunity to provide comment on the proposed development, please find Tamworth Regional Council's submission below:

Water

- Baiada has recognised that water scarcity in the region is a significant issue and sought to reduce the impact of the proposed development through the inclusion of a water recycling system which would reduce the demand on the town water supply from 8ML/day to 2ML/day.

For clarity, Council notes that it has not made provision within its existing reticulation network to deliver 8ML/day to the site of the Baiada Integrated Processing Facility (the proposed development). Consequently, it should not be assumed that 8ML/day would be available at the site without significant augmentation of the water reticulation network. In addition Baiada should investigate contingency arrangements for the provision of water for the development in the event that there is a failure in the water recycling system.

Wastewater

Reverse Osmosis Concentrate

- The Environmental Impact Statement (EIS) states, in a number of locations, that the reverse osmosis concentrate stream "will have a high concentration of dissolved salts" and "is intended to be discharged to the municipal sewer." Figure 16 of the EIS (page 87) states that the volumetric flow of the Reverse Osmosis (RO) Concentrate will be 2000m³/day, with Total Dissolved Solids (TDS) in the order of 5450mg/L. As noted in the EIS, a trade waste approval will be required before any trade waste, such as the concentrate stream, can be discharged to Council owned sewers and then for further treatment. The NSW Government's Department of Planning, Industry and Environment must grant concurrence to any trade waste application before Council can issue an agreement. Council's Environment Protection Licence (EPL) for the discharge of effluent to its 100% Effluent Reuse Farm has a TDS limit of 600mg/L and the proposed discharge of the RO Concentrate to TRC's sewerage system will result in TRC not being able to comply with its EPL limit for TDS. As a result a Trade Waste Approval could not be issued under the proposed arrangements.

All correspondence should be addressed to the General Manager:

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Council will continue to work with Baiada in relation to this issue however as the RO Concentrate cannot be accommodated within TRC's sewerage system under existing arrangements, the environmental assessment should include alternative methods for the disposal of the RO Concentrate.

Secondary Effluent Discharge

- The Environmental Impact Statement states that "Up to 50% of Influent Flow", or 4 ML/day, of Secondary Effluent may be discharged, depending on the volume of wastewater intended to be recovered for re-use. However, there is no indication of where this Secondary Effluent is to be discharged to.

Council advises that it has not made provision for this discharge in either its sewerage reticulation system, its wastewater treatment system, or its effluent disposal system. To make provision for an additional 4ML/day of trade waste, significant augmentation of Council's sewerage system, including treatment and disposal components, would be required. Additionally, as with the limitations which would need to be in place for the RO Concentrate, limitations may be needed on the Secondary Effluent to ensure that Council could meet its EPL limits.

In order to fully assess the environmental effects of the proposed development, the Environmental Impact Statement should identify the end point for the disposal of the 4ML/day discharge and assess the impact of such a discharge on the receiving environment.

Sludge

- The process flow diagrams provided for the wastewater treatment system in the EIS indicate that there will be sludge from the Covered Anaerobic Lagoon, the Sequencing Batch Reactors, and the Secondary Solids Removal DAF. Section 4.14.3 indicates that the wastewater treatment system generates "a very small amount of solid material" and this "solid material is biological in nature, with some trace elements (mostly phosphorus) and is suitable for the beneficial application to land." Although the EIS states that this waste stream is "suitable" for beneficial land application, it does not specifically advise where the waste sludge streams will be disposed of, nor does it make a commitment to disposing of this waste by beneficial application to land.

Currently, a significant amount of DAF sludge from existing Baiada facilities is disposed of to Council's Forest Road Landfill each year.

The environmental assessment should identify each of the sludge streams, provide expected volumes produced by each, and nominate the final disposal points for each stream, so that the impact of the proposed disposal may be properly understood and assessed.

Domestic Sewage

- The Environmental Impact Statement should confirm that the trade waste and the domestic sewage wastewater streams from the development are to be kept separate, and nominate the volume, flowrate, method and location of the disposal of the domestic sewage to Council's sewer.

Waste

- Baiada currently contributes 10-15% of waste landfilled at Forest Road Landfill each year. Consequently, a three-fold increase in Baiada's processing capacity is of particular concern to Council. Baiada's three largest categories of waste in descending order of volume are Offal, DAF Sludge, and Commercial Non-recyclable. DAF Sludge has been discussed in the Wastewater comments above.

Solid and Packaging Waste

- The anticipated annual volumes of recyclable and non-recyclable waste should be provided.

Processing Wastes

- The Environmental Impact Statement implies in section 4.14.2 that solid waste, such as offal, will be fully recycled, as there is discussion of this recycling and no indication that any of this waste would remain to be disposed of. The EIS should provide more detail on the types of solid waste generated on site, the amounts generated, the amount, if any, of this waste that will be disposed of offsite, and the method for disposal.

Council recognises the economic development potential of this development for the City of Tamworth and will work with the developer to find solutions for the water, wastewater and waste issues identified.

Section 7.12 (Indirect) Development Contributions

- Contributions pursuant to section 7.12 of the Environmental Planning and Assessment Act 1979 should be levied in accordance with the Tamworth Regional Council Section 94A (Indirect) Development Contributions Plan 2013. It is noted on page 35 of the EIS that “For the purposes of calculating any contributions payable under the Tamworth Regional Council Section 94A (Indirect) Development Contributions Plan 2013, a levy of 1% of development costs (the costs of erecting a building) would be payable based on \$132,947,020 which excludes equipment costs and consultant fees.

As the total cost of the development is \$208,545,901, a cost breakdown demonstrating how the \$132,947,020 figure was calculated in relation to the Tamworth Regional Council Section 94A (Indirect) Development Contributions Plan 2013 is requested.

Section 64 Water and Sewer Headworks

- Contributions pursuant to Section 64 of the Local Government Act 1993 would be levied, based upon water usage and wastewater discharge.

Water and Sewer Headwork’s contributions would be calculated based on adopted rates under Councils Annual Operation Plan. Revised rates adopted in subsequent Annual Operation Plans will apply to Headworks Contributions paid in later financial years.

Should you require any further clarification in relation to the matters raised above, please contact Acting Manager, Development and Approvals Sam Lobsey on the number below.

Yours faithfully,



Sam Lobsey
Acting Manager, Development and Approvals

Contact: (02) 6767 5432 or s.lobsey@tamworth.nsw.gov.au

Council Reference: LF13650

19 August 2019