

NSW Government Major Projects Department

NSW State Government

21 October 2019

## **Re: Planning application SSD-9143 – Goulburn Poultry Processing Mixed Use Development**

I write in reference to planning application SSD-9143, which seeks permission for the construction of a poultry abattoir at Goulburn.

With 27 appendices, the application provides a great deal of information about the proposed development, yet I am concerned that not all requirements of the Planning Secretary's Environmental Assessment Requirements (SEARs) process have been addressed, particularly in relation to community consultation and animal welfare. I am also concerned about the location of the facility, which is not permitted according to the Goulburn Mulwaree Local Environment Plan (LEP).

The application is for the development of ***a large, odorous, intensive animal slaughtering facility within the town boundary of Goulburn which will operate 24 hours a day***. It is a potentially hazardous and offensive industry. Therefore, I ask for your consideration of the following issues:

### **Location**

In a letter from Michael Saxon dated 16 July 2018, a "poultry facility is prohibited within all [three proposed] zones" in the Goulburn Mulwaree Local Environment Plan (LEP)<sup>1</sup>. Yet on the grounds that the childcare centre and cold storage facility are permissible within the B6 zone, then consent *may be* granted for the poultry processing facility, despite it being prohibited in all three zones. In other words, ***the childcare centre was an added inducement for the proposal*** (please see my comments listed under Childcare Facility).

The proposed development will be a significant footprint on within the town boundary and very close to the Sydney Road - the gateway to Goulburn City from the north. One would expect a more salubrious entrance to a heritage city, considering Goulburn's visitor-attracting potential. While the proposed development may not impact on the commercial viability of the neighbouring operations (a large high quality tourist motel, a service station, cafe and a McDonalds), the overall amenity of the area will be negatively affected.

This is not a fitting location for an operation of this type and size within a rural city with tourism aspirations. How will this development impact on the Rocky Hill War Memorial Museum, a new cultural facility currently under redevelopment, which has views over the site? I believe that this facility would diminish the character of the rural landscape, spoil natural vistas and have a negative impact on the gateway to a city.

### **Traffic movement**

For the proposed poultry abattoir, up to 1 million birds could be trucked to and slaughtered at the facility every week. This would direct a lot of traffic to the northern side of town, which would place ***significant pressure on existing infrastructure***. The proposed development is anticipated to accommodate a total of up to 150 B-double truck movements per day to and from the site, with an average of 10 truck movements per hour during the daytime period. Birds of all sorts – chickens, geese, turkeys and quail will be brought from broiler farms ***in all***

**directions**, and not just along designated highways. There is an existing animal abattoir on the southern outskirts of Goulburn. I drive to Canberra regularly and notice the truck movements associated with this operation; yet I live on the northern side of town.

As a local resident, this massive increase in heavy vehicle movements is very alarming indeed! Goulburn has problems with heavy vehicle movements through the city now, particularly along Sloane Street and Auburn Street (which is still the main highway through to Crookwell). At the moment, heavy vehicles do everything they can to avoid the Auburn Street turnoff to Crookwell. Currently they turn off at the intersection of Union Street and traverse Kinghorne Street to access the Crookwell Road. A recent traffic study recorded over 7,000 vehicles a day on this road, many of them oversized vehicles. Our quality of life, and property values, have already been affected by this increasing heavy vehicle traffic movement. With this proposed development, the situation on the northern side of the city will only get worse.

### **Childcare Facility**

I am deeply disturbed and perplexed about the co-location of a childcare facility at the site. Childcare centres are normally located near other compatible social uses such as educational establishments, parks and community facilities. While childcare facilities are often co-located near places of employment, I don't consider this facility to be a compatible place of employment. This proposed development is close to Goulburn, not in a remote location and should not require an on-site childcare facility. Exposing children to the normalcy of killing animals is not a socially acceptable thing to do in our society today. It will de-sensitise them to a most distasteful aspect of life at a very early age. Psychologists and psychiatrists know that children who treat animals badly, tend to become more serious offenders. Animals have a positive effect on Post Traumatic Stress (PST) sufferers, the sick and prisoners. Developing positive relationships with animals is good thing for society. Goulburn has a low socio-economic base; the educational levels of the population are much lower than surrounding towns such as Crookwell, Gunning, Canberra and Yass. As the [REDACTED] for some years, I am aware of the need for healthy associations for children in Goulburn.

### **Waste & Odour**

As well as the poultry waste and the bodies of dead poultry, the facility will produce strong odours, which could disturb local residents and other businesses and have a negative impact on their quality of life. The nearest residential and commercial operations (including tourist motels) are located approximately 60m and 75m, respectively, from the closest boundary to the site. It is estimated that a population of approximately 100 people (including the occupants of the proposed child-care centre) may be affected.

The proposed development, which has a very large footprint, is also located very close to another significant odour-producing activity – the Goulburn Mulwaree Tip. These two facilities combined are likely to have a significant cumulative odour impact in the area. The NSW guidelines on this matter refer to “two or more facilities with similar odour character” .... will result in cumulative odour impacts<sup>2</sup>. ***The two facilities are large significant industrial, odour producing operations.***

### **Water usage**

There are concerns that the development would use up to 40% of Goulburn's daily water consumption. The water must be fresh out of the tap. Recycled water is unsuitable. With 192,000 birds a day to be processed at full capacity and 14 litres of water needed to process each bird, the expected daily water draw from the mains system will be 2.688 megalitres – more than 40 per cent of the entire city's minimal daily use. Water is gold in Australia, thanks

to the combined effects of climate change and drought so this development is not acceptable at all!

### Animal welfare

As a modern animal processing facility, one would have expected a detailed report demonstrating how the facility will operate within animal welfare standards and codes. ***This should have been at the very heart of the development application.*** It was also identified as a requirement in Appendix O (SEARs requirements). But of the 27 attachments, I could only find one report that mentioned animal welfare - the *Environmental Impact statement* (6.8.1) and this was ***a mere 335 words***<sup>3</sup> (see listed below) acknowledging that regulations and codes of practice actually do exist! To be compliant with the SEARs process, I would have expected a full detailed report outlining how the facility was going to meet (and preferably, exceed) existing standards and codes of practice. Where are the studies that examine all the steps in the humane processing of birds, the risk assessments in handling and processing different bird species, their transportation to the facility, the equipment to be used, staff training in animal handling and welfare, compliance and biosecurity concerns? Will the facility include surveillance systems to monitor the processing of birds, as recommended by the Animal Defenders Office, to ensure that they meet animal welfare standards are met, and who will monitor this?

There has been a groundswell of public interest in farmed animal welfare, particularly in relation to abattoirs. I draw your attention to the horrific exposure made by the ABC 7.30 Report on just this issue related to the slaughter of horses in an “approved” abattoir. Governments have a significant role to play in promoting transparency and trust in animal welfare compliance monitoring systems. Unfortunately, all governments are guilty of delegating animal welfare in the agribusiness sector to the RSPCA - ***an overworked and under-funded charity***. The codes, regulations and standards of animal welfare in the food industry in Australia are absolutely pitiful. They focus on hygiene rather than animal welfare, and because of this, animal activists have become involved.

The facility would cause immense suffering to the birds slaughtered there. Birds are intelligent, social animals who can feel pain and distress. In order to kill 1 million birds a week, the slaughter line will be relentless and because of the fast pace of the work, not always accurate or humane for the birds who fight until the end to keep their lives. People are turning away from meat in droves because of the animal cruelty involved. This change in the public perception of animal factory farming is growing rapidly. Very soon scientists will be producing meat from laboratories and this will be happening sooner than we expect. I do not buy meat that is processed through these facilities, and it would be totally abhorrent to me to have such a reminder of abject animal cruelty right under my nose. I will be moving from this dreadful utopian nightmare as soon as possible.

### Community consultation

The importance of “effective and genuine community consultation” was highlighted by Chris Ritchie, Director Industry Assessments, Department of Planning & Environment, in a letter dated 25 July 2018 . However, while animal welfare is mentioned briefly in the community consultation strategy, there is no further mention of this issue in the *Consultation Outcomes Report*, nor were there any animal welfare issues raised by the nine people who did raise issues. The consultants should have been more proactive in consulting this interest group as they are ***major stakeholders***. Failure to seek out this interest group has been a major oversight in the process. If the people consulted did not raise these concerns then the consultants were simply consulting with a narrow range of interest groups and stakeholders. Wider consultation and collaborative discussions with animal welfare agencies must take place. I am very disappointed that the developers have not foreseen this rapid change in public opinion and acted accordingly.

The bottom line is that this development is another horrific industrialise animal processing facility that will destroy a regional city that struggles with a poor public image (as a maximum security gaol town) with many serious social issues.

While Goulburn is desperate for employment opportunities and good economic development, this is certainly not the sort of development that the community should be considering. Goulburn's main claim to fame is its highly significant history and architectural heritage. Cultural tourism should be a key strategic focus for the future. This proposal is an anathema to this vision for the city.

Yours sincerely,

Name supplied

1. Michael Saxon, Letter dated 16 July 2018, Appendix O, page 1.

2. Technical Notes: Assessment and management of odour from stationary sources in NSW (Technical Notes) (DEC, 2006)

3. EIS 6.8.1:

Animal Welfare Owners and operators of poultry operations have a responsibility to ensure that bird handling and transport is done so in a way to avoid causing injury or undue suffering, and destruction of poultry is carried out in a humane fashion. WRP will meet all standards of care and management for animal health and welfare as required by the relevant standards and guidelines. The conditions under which poultry livestock will be managed during their transportation, holding and destruction will be in accordance with the Australian Animal Welfare Standards and Guidelines Land Transport 7043\_EIS\_Goulburn\_WRP\_August 2019 165 of Livestock (DAFF, 2012), and in conjunction with other relevant government and industry endorsed codes of practice designed to safeguard animal health and welfare, including: • Australian Poultry CRC, 2008. National Animal Welfare Standards for the Chicken Meat Industry: The Standards. Australian Poultry CRC Pty Ltd. Australian Poultry Cooperative Research Centre Pty Ltd. • Primary Industries Standing Committee, 2006. Model Code of Practice for the Welfare of Animals – Land Transport of Poultry. 2nd Edition PISC Report 91. CSIRO Publishing. To ensure the regulatory requirements are met, and good practice in terms of animal care and welfare is achieved, WRP will implement standard operating procedures with consideration to the following general aims: • All personnel responsible for the management and operation of facilities and equipment, care and handling of birds will be competent and trained. • Handling and transportation of poultry will be undertaken in a way that minimises risk to their welfare. • Facilities and equipment will be designed, maintained and operated to ensure minimal interference or stress to birds. • Protection from weather will be provided to birds in transit and awaiting slaughter. • Birds held in containers in holding for slaughter will be slaughtered as soon as possible, with maximum holding periods adhered to. • Sick or injured birds unloaded from containers will be destroyed immediately. • Birds are handled and destroyed in a manner that minimises risk to their welfare, and delivery and processing are planned to minimise time birds are held in containers before slaughter.