

Hunter New England Local Health District
Hunter New England Population Health
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30 October 2018

Ms Sally Munk
Senior Environmental Planner
Industry Assessments
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms Munk

ProTen Tamworth Pty Limited; Proposed Rushes Creek Poultry Production Farm, SSD7704

Thank you for the opportunity to provide advice on the Environmental Impact Statement (EIS) for Rushes Creek Poultry Production Farm, SSD7704. Hunter New England Local Health District makes the following submission for your consideration.

Hunter New England Local Health District (HNELHD) has reviewed the EIS concentrating on the human health, air quality, odour and noise assessments.

The advice provided in this letter is contingent on confirmation by the NSW EPA that the methods employed to assess air quality, odour and noise impacts are appropriate. If this was found not to be the case, our advice would need to be considered with regard to the methodological issues identified by the NSW EPA.

The appendix to this letter provides detailed advice on the EIS as exhibited. HNELHD will be in a position to provide further comment once a more comprehensive report is provided by the proponent.

Should you wish to discuss this matter further, please contact Mr Glenn Pearce, Senior Environmental Health Officer on 6764 8000.

Yours sincerely


Professor David Durheim
Service Director - Health Protection
Hunter New England Population Health

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Appendix

Detailed advice on the Environmental Impact Statement for Rushes Creek Poultry Production Farm, SSD7704

The proposal is for a large-scale intensive poultry production farm. The development site comprises approximately 1,016 hectares of rural land in an area known as Rushes Creek.

The site is located approximately 43 kilometres (km) northwest of Tamworth and 33 km northeast of Gunnedah in the New England North West region of New South Wales (NSW), near Lake Keepit within the Tamworth Local Government Area.

The nearest substantially populated areas are the villages of Somerton and Manilla, which are located approximately 12 km to the southeast and approximately 13 km to the northeast, respectively.

The project will comprise 54 tunnel ventilated fully-enclosed climate-controlled poultry sheds, along with associated support and servicing infrastructure, and will have the capacity to house 3,051,000 birds.

Odour

A significant risk of odour emissions was identified in the EIS. Noxious or offensive odours are a frequent cause for complaint by the community and may cause environmental nuisance.

Hunter New Local Health District defers to NSW EPA for specialist advice on the methods employed to assess odour impacts. The EIS uses an adopted odour criterion of 5ou in its modelling scenarios. HNELHD notes that NSW EPA recommends in its submission that a criterion of 3ou be adopted, and that under these criteria, the proposal would cause exceedances at three additional sensitive receptors. In view of the methodological uncertainty in odour assessment, and the noted exceedances of recommended criteria even in the absence of a cumulative odour impact assessment, HNELHD supports NSW EPA's recommendations that the proponent:

- provide further information on the model specifications, demonstrating that worst case odour emissions have been modelled
- consider future feasible odour mitigation measures, and
- develop a contingency plan to address unpredicted operational odour impacts

Air Quality

HNELHD notes that the cumulative particulate assessment presented in the EA has not been carried out in accordance with the *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* (EPA 2017). In addition, exposure to particulate

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matter with a diameter of 2.5micrometres or less (PM2.5) was not considered in the EA. This was justified on the basis that developments complying with criteria for PM10 were unlikely to contribute exceedances of PM2.5. However, the air quality assessment predicted one exceedance of PM10 impact assessment criteria at receptor R25. The air quality assessment also did not consider emissions from combustion of fuels (eg. diesel) or traffic dust generated during construction or operation, citing these as 'minimal'.

Until an appropriate quantitative assessment of the cumulative air quality impacts of the development using appropriate meteorological data has been provided, HNELHD is unable to provide further comment on the air quality impacts of the proposed development.

Noise

Environmental noise can have adverse impacts on human health and wellbeing. Receivers in the locality surrounding the proposed site are primarily residential (rural).

HNELHD defers to the NSW EPA as the Appropriate Regulatory Authority that the noise impact assessment indicates that the project can comply with the *NSW Industrial Noise Policy* (EPA 2000) and will be subject to standard conditions in the EPL. However it is noted that there is the potential for sleep disturbance with the 24/7 operation of the facility, particularly during bird collection which is scheduled to occur between 7pm and 4pm. HNELHD recommends that noisy operations such as truck movements should ideally be limited to between the hours of 7am to 10pm to minimise noise impacts on the nearby residences.

In accordance with best management practices, HNELHD recommends that the proponent:

1. **Prevent** generation of noise at source by good design and maintenance.
2. **Minimise or contain noise at source** by observing good operational techniques and management practice.
3. **Increase the distance** between the source and receiver.
4. **Use physical barriers or enclosures** to prevent transmission to sensitive receptors.
5. **Practice considerate timing and control** of unavoidably noisy operations.

Pest Management and Vector Control

The detention and redirecting of surface water in heavy rainfall events (**3.12 pg 29**) to "two small basins constructed at the corner of the poultry farm" location is not clearly defined in the Exhibited EIA, the capacity of basins is also not clearly defined. Retention of water in basins may create mosquito breeding habitat and increase the risk of mosquito borne disease. The plan needs to provide strategies for the management of risks on-site, including pest breeding sites and harbourages during

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construction and ongoing operational phases of the project. These may be incorporated into the project's Pest Management Plan.

Potable Water Supply

The Exhibited EIS states that the supply of on-site "Potable Water" is to be "via rainwater collection (tanks) from the roofs of staff amenities buildings and residences". There is the potential for these water sources to be impacted by dust from site, which may contain enteric pathogens such as *Salmonella* and *Campylobacter*. Businesses or facilities that supply drinking water from an independent water supply (i.e. not town water) need to follow the *NSW Health Private Water Supply Guidelines* (2014). The *Public Health Act 2010* and the *Public Health Regulation 2012* require drinking water suppliers, including private water suppliers, to develop and adhere to a 'quality assurance program' (or drinking water management system). Further information and templates can be found at: <https://www.health.nsw.gov.au/environment/water/Pages/NSW-private-water-supply-guidelines.aspx>

In addition, no consideration is given in the current EIS to the potential impact of dust (which may contain faecal pathogens) on rainwater collection of neighbouring residences. HNELHD recommends that a public water use survey be considered as part of its ongoing community consultation and that the potential impact of dust generated on water quality of neighbouring properties be considered as part of its revised EIS, should residents be reliant on rainwater. The assessment should also include comment on how complaints from the neighbourhood about rainwater will be addressed.

The peak reference document in Australia for information in relation to rainwater tanks is enHealth's *Guidance on use of rainwater tanks* (2010), which is accessible at: <http://www.health.gov.au/internet/main/publishing.nsf/Content/ohp-enhealth-raintank-cnt.htm>

Groundwater

The EIS suggests that there will be minimal groundwater impacts due to the lack of groundwater extraction or use by the Development, the depth of the aquifer and the enclosed nature of the sheds. The proponent should also consider the potential for groundwater impacts of leachate, eg. in the event of a mass mortality resulting in mass in-shed burial of carcasses.

Biosecurity

Although biosecurity provisions aimed at mitigating risk disease transmission of disease within and between flocks are detailed in the EIS, intensive poultry farming can also pose potential human health risks for zoonotic disease transmission (e.g. psittacosis and avian influenza) for poultry workers. Worker health and safety is beyond the scope of NSW Health review, however, we would emphasise the need to

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take all necessary precautions to protect workers' health and safety, eg. through worker education and provision of appropriate personal protective equipment, in conjunction with advice from SafeWork NSW.

Community consultation

The Proponent outlines a number of planned strategies for communicating with the community, including information sessions, letter-box drops and face-to-face meetings "if requested" by the community stakeholders. In addition, it will operate its ongoing environmental hotline number. HNELHD recommends that the Proponent develop a clear communication plan in consultation with the community, and articulate in its EIS how health concerns and disputes thereof will be handled.

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