



Environmental Protection Authority

Ms Amanda Butterworth
Allerding and Associates
125 Hamersley Road
SUBIACO WA 6008

Your Ref:
Our Ref: CMS15059
Enquiries: Stephen Pavey, 6145 0800
Email: Stephen.Pavey@epa.wa.gov.au

Dear Ms Butterworth

NOTICE UNDER SECTION 39A(3) *Environmental Protection Act 1986*

PROPOSAL: Alterations and Additions to Existing Poultry Farm
LOCATION: Lot 32 Douglas Road, Beermullah
PROponent: Snowdale Holdings
DECISION: Not Assessed: Public Advice Given

The Environmental Protection Authority (EPA) understands that you wish to undertake the above proposal which has been referred to the EPA for consideration of its potential environmental impact.

This proposal raises a number of environmental issues. However, the overall environmental impact of the proposal is not so significant as to require assessment by the EPA, and the subsequent setting of formal conditions by the Minister for Environment under Part IV of the *Environmental Protection Act 1986*. Accordingly, the EPA has determined not to assess this proposal.

Nevertheless, the EPA has provided the attached advice to you as the proponent, and other relevant authorities, on the environmental aspects of the proposal.

The EPA's decision to not assess the proposal is open to appeal. There is a 14-day period, closing 29 June 2015, during which, on payment of the appeal fee, an appellant may ask the Minister to consider directing the EPA to reconsider this decision or conduct a formal assessment.

Information on the outcome of the appeals process is available through the Appeals Convenor's website, www.appealsconvenor.wa.gov.au, or by telephoning 6467 5190 after the closing date of appeals.

Yours sincerely

A handwritten signature in black ink, appearing to read 'A. Sutton', with a stylized flourish at the end.

Anthony Sutton
Director
Assessment and Compliance Division

For the Chairman of the Environmental Protection Authority
Under Notice of Delegation No. 33 dated 6 December 2013

15 June 2015

Encl: Public Advice

**PUBLIC ADVICE UNDER SECTION 39A(7)
ENVIRONMENTAL PROTECTION ACT 1986**

**Alterations and Additions to Existing Poultry Farm –
Lot 32 Douglas Road, Beermullah**

Summary

The Shire of Gingin has referred an application to make alterations and additions to an existing Poultry farm. The application, from Allering and Associates on behalf of Snowdale Holdings Pty Ltd, is to add four additional free range chicken sheds and associated paddocks, a manure storage shed, workers accommodation for staff, and to relocate the proposed caretakers dwelling. The purpose of the alterations and additions is to increase the farm capacity from 120,000 to 240,000 chickens.

The proposal was advertised for public comment and the Environmental Protection Authority (EPA) notes that no public comments were received.

The EPA has considered the proposal in accordance with the requirements of the *Environmental Protection Act 1986* (EP Act) and the *Environmental Impact Assessment Administrative Procedures 2012* (EIA Administrative Procedures). In making its decision on whether to assess the proposal, the EPA considered the 10 aspects of the significance test as set out in clause 7 of the EIA Administrative Procedures:

1. values, sensitivity and quality of the environment which is likely to be impacted;
2. extent (intensity, duration, magnitude and geographic footprint) of the likely impacts;
3. consequence of the likely impacts (or change);
4. resilience of the environment to cope with the impacts or change;
5. cumulative impacts with other projects;
6. level of confidence in the prediction of impacts and the success of proposed mitigation;
7. objects of the Act, policies, guidelines, procedures and standards against which a proposal can be assessed;
8. presence of strategic planning policy framework;
9. presence of other statutory decision-making processes which regulate the mitigation of the potential effects on the environment to meet the EPA's objectives and principles for EIA; and
10. public concern about the likely effects of the proposal, if implemented, on the environment.

The EPA identified the following preliminary environmental factors: Inland Waters Environmental Quality and Terrestrial Environmental Quality.

In considering the potential impacts of the proposal on the above preliminary environmental factors, the EPA has had particular regard to:

- distances between wetlands and the proposed chicken sheds and paddocks;
- stocking rates and waste disposal;

- the mitigation strategies proposed by the proponent to avoid and minimise impacts, for example
 - The Drainage and Nutrient Management Plan; and
 - The Waste and Manure Management Plan;

In summary, although the proposal raises a number of environmental issues, the EPA considers that the likely environmental effects are not so significant as to warrant formal assessment. The EPA is satisfied that these issues can be adequately managed by the Shire of Gingin through local planning scheme provisions, and the requirements of the Code of Practice for Poultry in Western Australia (Code of Practice) (March 2003) and the Environmental Code of Practice for Poultry Farms in Western Australia (ECoPPF) (2004).

The EPA also noted advice from the Western Australian Department of Agriculture and Food.

1. Advice and Recommendations regarding Environmental Issues

a. Inland Waters Environmental Quality

The proposal includes keeping 240,000 chickens on 8 paddocks of 16 hectares (total land area of 128 hectares). This equates to 1875 chickens per hectare which is above the Code of Practice maximum acceptable live weight density for free-range layer hens at 1500 birds per hectare. Overstocking could lead to a build-up of manure exceeding the soil's capacity to retain and break down nutrients.

The EPA recommends stocking levels do not exceed the Code of Practice maximum acceptable live weight density for free-range layer hens.

The proponent's proposed strategy to manage nutrients is to incorporate clays and clay loams for 20 metres around each shed, as well as monitoring nutrients and implementing contingency actions as described in the Drainage and Nutrient Management Plan (DNMP).

Proposed paddocks 1 and 8 are most likely to include areas of soils with poor nutrient holding capacity and may have high groundwater tables.

The EPA recommends the existing DNMP (Emerge, April 2014) is updated to reflect the farm expansion and independently peer reviewed prior to being provided to the Shire of Gingin. The DNMP should also address the potential for nutrient leaching and export beyond the 20 metre zone around the sheds, or provide justification as to why soil amendments are not required beyond 20 metres, particularly for paddocks 1 and 8.

b. Terrestrial Environmental Quality

Overstocking could lead to pasture damage and increase the risk of soil erosion through wind and rain.

The EPA recommends a stocking rate that meets the Code of Practice, and a Land Management Plan (LMP) to address the risk of land degradation which includes

strategies to maintain at least a 50% groundcover in all paddocks, and monitoring and contingency actions.

The EPA recommends that the LMP be independently peer reviewed prior to being provided the Shire of Gingin.

Other Advice

The western edge of proposed Paddock 8 extends into a Multiple Use Wetland (dampland) with its associated poultry shed located approximately 50 metres from the closest edge of the wetland. Wetlands are a congregation point for wild birds.

The Department of Agriculture and Food has advised the EPA that evidence strongly suggests waterfowl are the likely source in many Avian Influenza (AI) outbreaks in domestic poultry. The AI virus can transfer to domestic poultry through close contact with wild birds, particularly waterfowl, that visit wetlands close to where the domestic poultry flock are kept.

The ECoPPF recommends a buffer distance between new free range sheds and wetlands of 200 metres starting 20 metres from the shed perimeter. A distance of less than 200 metres from the wetlands to the poultry range and poultry sheds represents a risk that wild birds, including waterfowl, may interact with the domestic poultry flock.

As a signatory to the Emergency Animal Disease Response Agreement (EADRA), the poultry industry has acknowledged the need for biosecurity risk reduction measures to reduce the risk of entry and spread of emergency animal diseases (Schedule 14). It is the responsibility of the avian industry to implement a high standard of biosecurity, including biosecurity 'buffer zones', to protect their operations from disease.

Without significant risk mitigation measures, the EPA does not support a biosecurity 'buffer zone' that does not meet recommended guidelines.

Given the potential for AI outbreaks in domestic poultry the EPA recommends buffer distances that meet the requirements of the ECoPPF, and a Biosecurity Management Plan which provides strategies to minimise the risk of wild birds coming into close contact with the domestic poultry flock.