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P 07 3255 9572

E info@alq.org.au

W www.alq.org.au

A Suite 6, 478 Ipswich Rd, Annerley

M PO Box 463, Annerley QLD 4103

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Chief Executive Officer
Charters Towers Regional Council
PO Box 189
CHARTERS TOWERS QLD 4820
Sent via email to - mail@charters Towers.qld.gov.au

MC18/63 - Material Change of Use - Intensive Animal Industry (beef cattle feedlot) in Reid River **Submission on behalf of Animal Liberation Queensland**

Dear Charters Towers Regional Council,

Thank you for the opportunity to provide a submission concerning the proposed change application for an intensive cattle feedlot at 5291 Flinders Highway, Reid River.

Animal Liberation Queensland (ALQ) is an independent not-for-profit organisation that acts on a broad range of animal protection issues.

After assessing the application and supporting documentation, I advise that ALQ strongly opposes the proposed development. Our reasons for this objection include:

- the danger of pollution spillage from inadequate holding and sedimentation pond capacity
- threat to the Great Barrier Reef and Ramsar wetlands
- proximity to neighbouring properties and Reid River Rest Area (odour and dust impacts)

A summary of the evidence base underpinning these objections is provided below.

1. Danger of pollution spillage from inadequate holding and sedimentation pond capacity

ALQ understands that the existing sedimentation ponds have been designed for peak capacity during a 1 in 20-year storm event, and the holding ponds have been designed for volumes during a 1 in 20-year storm event or 90th percentile wet year.

In a climate that is rapidly changing, and as Queensland is looking into our third La Niña year in a row, this level of flood risk for effluent and sedimentation spillage is far too high.

In January this year, parts of the region experienced 381mm of rain in just 24hrs. This came just 3 years after the 2019 floods- the worst in the region's history. Other parts of Queensland have experienced several '1 in 100-year' flood events within a few months.

Given the above, there is an extremely high risk of toxic effluent and sedimentation being released into the environment during heavy rainfall, which is now to be expected. Given the high levels of nutrients, particularly reactive nitrogen and phosphorous, plus pathogens, heavy metals and other long-lived contaminants that are contained in these ponds, this poses an unacceptable level of risk for the environment.

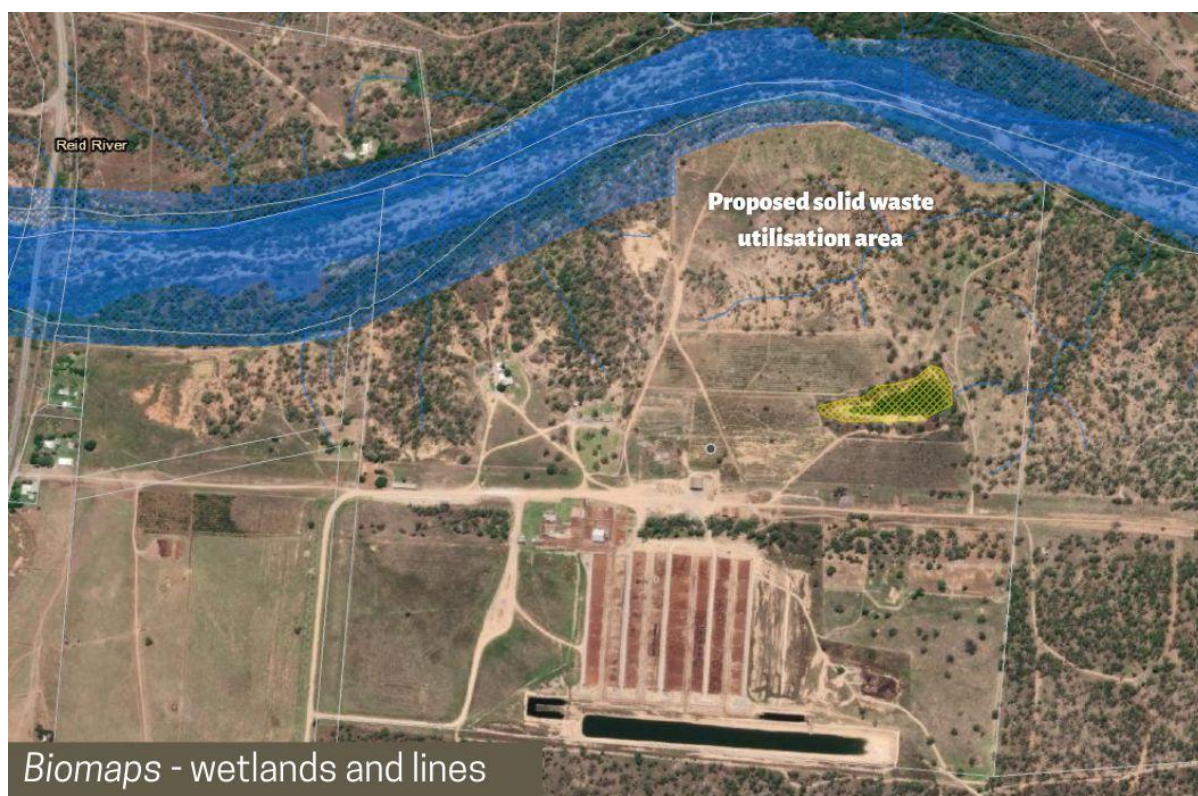
Noting these considerations, we regard the holding pond and sedimentation pond capacity to be inadequate.

2. Threat to Great Barrier Reef and Ramsar wetlands

This site is located in the Haughton catchment - one of the most flood-prone catchments in Queensland - the most disaster-prone state in Australia. This entire site is located on a flood plain and it is completely unsuitable for this type of development. The applicant claims, per their own modelling, that the site would not be inundated during a 1 in 100-year flood event, despite the subject land being relatively flat, on a river levee and despite all of the subject land being mapped as a flood hazard area on the Queensland Floodplain Assessment overlay.

The Reid River is a major tributary to the Haughton River, which drains directly into the Pacific Ocean and the Great Barrier Reef Marine Park (GBRMP). The applicant mentions that there are mitigation measures proposed to minimise adverse impacts to surface water to avoid adverse impacts on the GBRMP, however, it's not clear what these are.

The applicant is proposing to spread solid waste on top of drainage lines that flow directly into the Reid River, and the proposed solid waste utilisation area spreads almost to the property boundary on the northeastern boundary, extremely close to the river system.



The Haughton River catchment poses a great deal of risk to the Great Barrier Reef. After climate change, poor water quality is the biggest threat to the reef, and scientists have found that pollutants can travel long distances and impact reefs up to hundreds of kilometres away.

Furthermore, this site is 30-40kms upstream of Bowling Green Bay- wetlands of international importance, which would likely be impacted by runoff should this subject land become inundated or experience an effluent holding pond spill.

The Australian Government's Reef 2050 plan¹ outlines targets for an 80 per cent reduction in river nutrient loads by 2025. Reducing nutrients flowing from polluting rivers to the reef is critical in helping to sustain its health, and this development would be in conflict with these targets.

3. Proximity to neighbouring properties and Reid River Rest Area (odour and dust impacts)

The feedlot pens are within 1km of homes both on the west and the north. The occupants of these homes will undoubtedly be impacted on a daily basis by odour and dust from the feedlot operation. The applicant is even proposing to spread solid waste and spray effluent within meters of the property boundary on the west, which will be around 100 meters from a home.

There is also a popular caravan/camping spot - the Reid River Rest Area, just 1200 meters from the development site. The rest area is utilised all year round by caravaners and tourists, who will also be impacted by odour and dust particles.

¹ <https://www.dcceew.gov.au/parks-heritage/great-barrier-reef/long-term-sustainability-plan>

Dust can travel hundreds of meters, and remain airborne for hours, even days. On windy days, dust particles will easily reach the nearby receptors, as well as any vehicles or machinery nearby, all of which can be impacted by dust. Dust and odour nuisance has the ability to negatively impact health, and lifestyle and dust can also damage property.

The applicant has not demonstrated that they can manage the odour, dust and air impacts on these sensitive receptors.

The *Eligibility criteria and standard conditions for cattle feedlotting (ERA 2) – Version 2²* require that feedlot complexes are not within 1000 meters of a dwelling, however, this development is within 1000 meters of multiple dwellings.

4. Summary and conclusion

This development poses a high level of risk to the Great Barrier Reef, Ramsar wetlands, wildlife, vegetation and the wider ecosystem as a whole and it is imperative that the council does not approve developments that cannot assure the protection of areas of ecological significance.

Furthermore, this development will impact both local residents, as well as tourists and guests to the region.

Rather than approving new or expanding factory farms, we urge the Charters Towers Regional Council to encourage and support sustainable ventures that work in harmony with the environment and align with social expectations, enrich the region, and thereby improve the health and wellbeing of all community members.

Thank you for reading and considering my objection to MC18/63. For the reasons outlined above, I request that Charters Towers Regional Council, as consent authority, refuse the application for an intensive cattle factory farm feedlot.

Please do not hesitate to contact me if you require further information or clarification.

Yours sincerely,

Amanda Holly

Amanda Holly
Campaign Manager
for and on behalf of Animal Liberation Queensland

Email: amanda@alq.org.au

Phone: (07) 3255 9572

Post: PO Box 463, Annerley QLD 4103

² <https://environment.des.qld.gov.au/assets/documents/regulation/pr-es-cattle-feedlot.pdf>