



ANIMAL LIBERATION
QUEENSLAND

SUBMISSION:

Charters Towers Regional Council

MCU2022/0011 - **Intensive Animal
Industry and ERA (Extension to Existing)** -
2859 Mount Hope Road, Llanarth Qld

**June
2023**



Creating a compassionate world

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13th June 2023

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MCU2022/0011 - Intensive Animal Industry and ERA (Extension to Existing) - 2859 Mount Hope Road, Llanarth Qld
Submission on behalf of Animal Liberation Queensland

Dear Charters Towers Regional Council,

Thank you for the opportunity to provide a submission concerning the Material Change of Use 2022/0011 - Intensive Animal Industry and ERA for the expansion of Llanarth Feedlot at 2859 Mount Hope Road in Llanarth.

Animal Liberation Queensland (ALQ) is an independent not-for-profit organisation that acts on various 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:

- animal welfare standards
- insufficient information regarding water supply and usage
- waste management and impact on the environment
- surface and groundwater impact
- impact of odour and dust on community amenity

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

1. Animal welfare standards

The applicants have designed this feedlot far below any animal welfare standards, with each animal only having around 5 m² of space.

The Australian Animal Welfare Standards and Guidelines for Cattle¹ (DAFF, 2013) state:

S10.1 A person in charge must ensure a minimum area of 9 m² per Standard Cattle Unit for cattle held in external pens.

The current Australian Model Code of Practice for Cattle 2nd edition (2004) states that:

2.2.6.4 The stocking density of pens or yards must take into account the age, size, behavioural needs, movement and feeding patterns of cattle. In any event, an absolute minimum space requirement of 9 m² must be provided.

The applicant states that the pen layout and capacity in the attached plans have been updated to reflect a *maximum* stocking density of 5 m²/SCU. This is an extremely high density and is almost half the recommended *minimum* stocking density of 9 m²/SCU.

This raises concerns for the welfare of these animals as this space allocation does not seem to adequately take into account the behavioural needs of cattle.

2. Insufficient information regarding water supply and usage

The applicant has failed to provide any information about their existing water entitlements but has identified their annual water requirements for the expanded feedlot to be in excess of 730ML per year at full capacity.

They state that drinking water for the cattle will be extracted from the Suttor River, and expect that a 'large portion' of the additional drinking water requirements will be sourced from rainwater captured from the roofs of the cattle pens. However there haven't been any calculations made to clarify what this 'large portion' would be, based on rainfall calculations, so it's unclear how much water the applicant is planning to extract from the Suttor River.

The mean annual rainfall for the area is only 646.5mm, with the majority of this rain falling between November and March. This will not allow for much rainwater to be captured from the pen roofs.

Furthermore, the applicant has used flow data from March 2023, which was taken only a few weeks after significant rainfall and flooding in the area. This doesn't seem to be a true representation of the flows in the Suttor River.

¹ DAFF (2013). **Australian Animal Welfare Standards and Guidelines for the Land Transport of Livestock.** Department of Agriculture, Forestry and Fisheries, Australian Government, Canberra, ACT.

According to the National Guidelines for Beef Cattle Feedlots in Australia², the applicant should **demonstrate** that they have access to '24ML per annum of high-security water per 1000 SCU for total water requirements'. This equates to 754ML per annum for 31,440 SCU. They have failed to do this.

3. Waste Management and Impact on the Environment

The applicant has not provided accurate waste production and management information. In the Feedlot Assessment Spreadsheet (dated 26 April 2023) provided in their response to the information request, the calculations are based on a feedlot capacity of 1,000 cattle and a stocking density of 17 m². How can this development application be properly considered against risks and impacts without the correct information?

The applicant also does not provide adequate information detailing daily mortality management and how a mass death event would be managed in accordance with the National Guidelines. The only information provided is that daily carcasses would be composted on the manure pad, without any detailing on how their operations would be scaled up to manage the increase in daily mortality rates in proportion to the increase in SCU.

The application simply points to a general area in the plan for mass carcass disposal without details on the size of the location, land type, etc. Its proximity to the existing water storage site is of particular concern, especially considering the land naturally slopes eastward according to the Environmental Impact Assessment. There are no details on how the risk of environmental harm to surface and particularly ground waters will be minimised in accordance with the National Guidelines.

4. Surface and Groundwater Impact

There are no details provided on how the effluent basins will be constructed to ensure that there won't be any spillover and/or leakage that could result in surface or groundwater contamination, other than noting that clay will be used. As stated above, the Feedlot Assessment Spreadsheet (dated 26 April 2023) provided is based on only 1,000 cattle. Whilst we understand that the proposed expansion will incorporate fully covered pens, there will still be some runoff due to pen slopes during heavy rainfall.

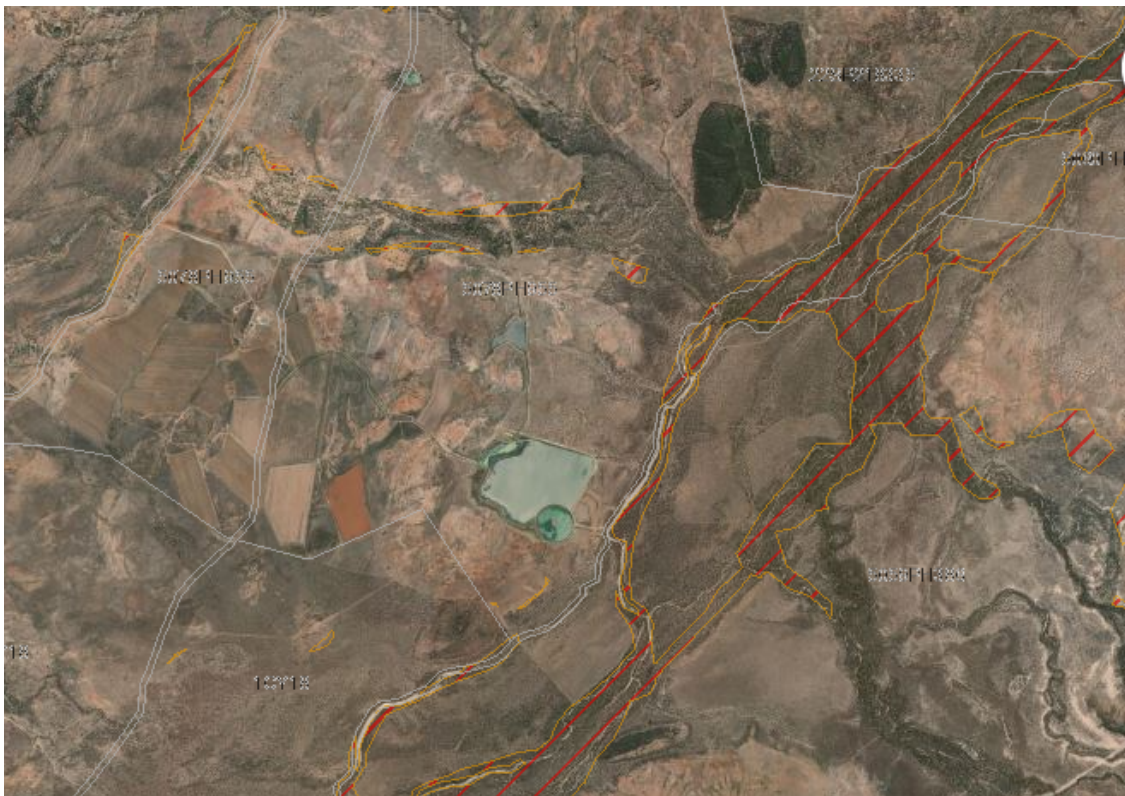
There is no indication that these effluent ponds or the effluent utilisation areas are large enough to sustain excessive runoff due to storms or prolonged rainfall. The land the proposed development is located on generally slopes to the east/northeast towards the Suttor River and Elizabeth Creek, waterways situated close to the land and therefore at risk of extreme pollution from effluent spillover or excessive runoff.

The site is also located near areas of dense regulated vegetation along the banks of the Suttor River and Elizabeth Creek which is mapped as "Category B – endangered or of concern", as marked in green in the figure below:

² *Meat & Livestock Australia National Guidelines for Beef Cattle Feedlots in Australia (2012)*, page 10
<https://www.mla.com.au/%2Fdownload%2Ffinalreports%3FitemId%3D1628&usq=AOvVaw0K2tU22HlpKSWDKATewREM>



Furthermore, endangered or vulnerable wildlife habitat is also mapped in this region, marked with red stripes in the below figure:



This contamination of waterways and the adjacent vegetation and wildlife habitat will involve excessive nutrients, microbial pathogens, and pharmaceuticals present in the waste, such as antibiotics and other veterinary drugs. Based on available data³⁴, generally accepted livestock waste management practices do not adequately or effectively protect water resources from contamination (Burkholder et al., 2007; Khan et al., 2008).

5. Impact of odour and dust on community amenity

The applicants claim that due to the proposed expansion being a covered feedlot, it will produce less odour than conventional feedlots due to there being less moisture in the pens. There isn't any supporting evidence to back this claim, and we would challenge the validity of this response to the information request.

The applicant states that "*rainfall-driven pen moisture and effluent generation are the major contributors to feedlot odour*". However, Meat & Livestock Australia's publication, *Management of odour, dust and flies*⁵ states that "Odour at cattle feedlots is mainly the result of **anaerobic breakdown of organic matter, primarily in manure but also in waste feed.**"

The applicant also states that manure moisture will be lower due to the exclusion of rainfall from the pens. But covered feedlot systems actually result in higher manure moisture due to the exclusion of the sun to dry the manure out.

The applicant also hasn't specified any measures to manage or minimise dust. Given this, we don't feel that they have demonstrated any ability to prevent dust and odour nuisance as a result of the proposed expansion.

³ Joanne Burkholder et al, **Impacts of Waste from Concentrated Animal Feeding Operations on Water Quality** <https://ehp.niehs.nih.gov/doi/full/10.1289/ehp.8839>

⁴ Khan, et al, *N.J Environment international*, **Chemical contaminants in feedlot wastes: Concentrations, effects and attenuation 2008, Vol.34** Page 839-859
<https://researchoutput.csu.edu.au/en/publications/cysticercosis-storm-in-feedlot-cattle-in-north-west-new-south-wal>

⁵ Meat & Livestock Australia, **Management of odour, dust and flies**, Page 2
https://www.mla.com.au/globalassets/mla-corporate/research-and-development/program-areas/feeding-finish-ing-and-nutrition/manure-handbook/section-3-odour-dust-and-flies-2016_07_28.pdf

6. Summary and conclusion

The Council's shared vision⁶ states: *"We will be a prosperous, innovative and forward-looking region that celebrates our cultural past whilst looking towards an environmentally friendly and economically exciting future. The Charters Towers Region will be a vibrant inclusive place to live, connected to nature and full of opportunity."*

The Council has an obligation to preserve water resources, biodiversity, environmental values and agricultural land. Approving this feedlot expansion puts all of these factors at risk. This development poses a high level of risk to water security, wildlife, vegetation and the wider ecosystem as a whole and the council must not approve developments that cannot assure the protection of areas of ecological significance.

Thank you for reading and considering my objection to MCU2022/0011. For the reasons outlined above, I request that Charters Towers Regional Council, as consent authority, refuse the application for an Intensive Animal Industry and ERA for the expansion of Llanarth Feedlot at 2859 Mount Hope Road in Llarnarth.

Yours sincerely,

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⁶ Charters Towers Regional Council, **Our Priorities, Mission and Values** - <https://www.charterstowers.qld.gov.au/priorities/priorities-1>