

Statement of Reasons

CENTRAL AGRI GROUP – BATCHELOR ABATTOIR

PROPOSAL

Central Agri Group (the Proponent) submitted a Notice of Intent (NOI) for the Batchelor Abattoir (the Proposal) to the Northern Territory Environment Protection Authority (NT EPA) on 18 March 2019, for consideration under the Environmental Assessment Act 1982 (EA Act). Further information was required and the Proponent submitted Supplementary Information on 4 July 2019 and 18 September 2019.

The Proposal is to recommence operations at the existing Batchelor Abattoir facility, located on an unzoned 827.7ha property approximately 2.5km to the west of Batchelor townsite (see Figure 1). The site operated as an abattoir from the 1960s until sometime in 2003 when operations ceased due to unfavourable industry conditions.

The Proposal will involve the slaughter and processing of up to 30,000 head of cattle per annum (approximately 160 head per day). Infrastructure covers an area of approximately 2ha and includes:

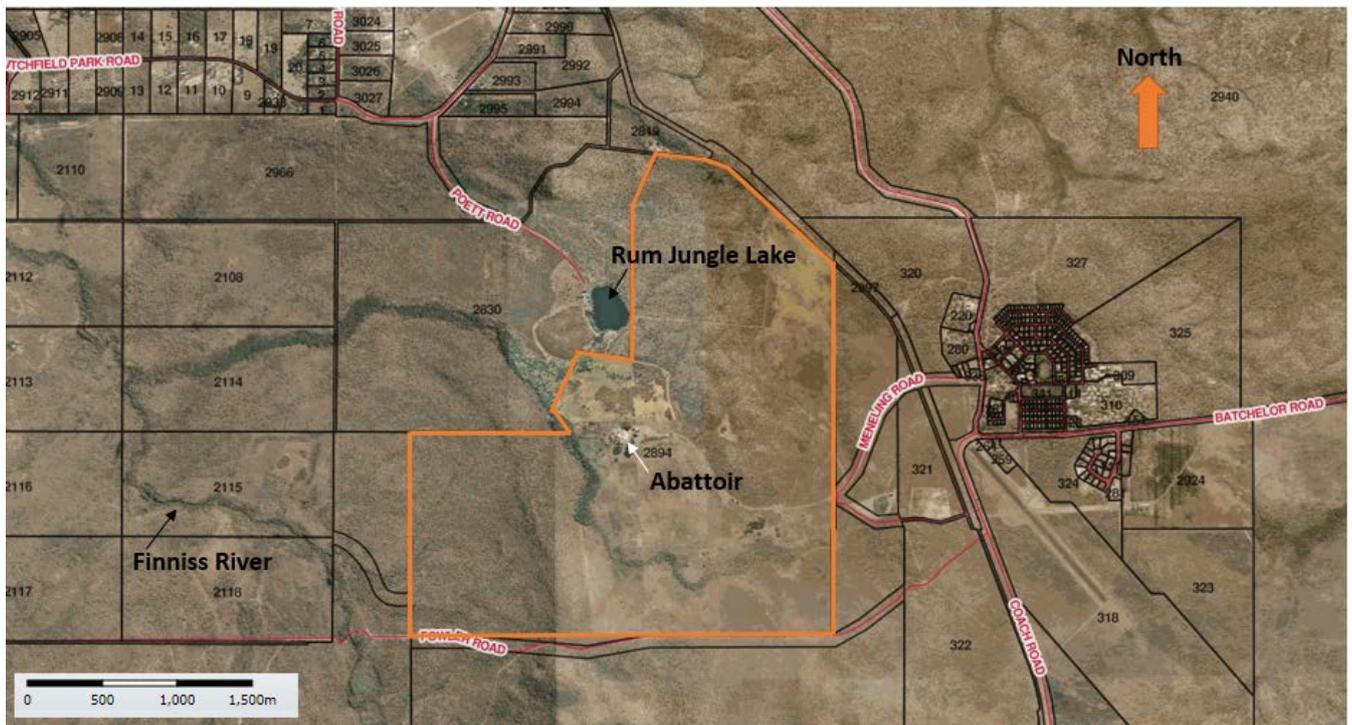
- holding yard with a total capacity of approximately 320 head of cattle
- slaughter floor with boning and slicing areas
- carcass chilling rooms, blast freezers and blast chillers
- rendering plant for processing animal by-products
- contra shear for screening wastewater
- two anaerobic ponds and one aerobic pond for wastewater treatment.

Waste treatment includes:

- dry scraping manure from cattle yards and stockpiling in windrows on a concrete bunded drying pad located immediately adjacent to the yards
- manure will be collected by a licensed contractor (estimated to be 24t per week) and disposed at an offsite location
- a primary treatment wastewater system and three wastewater ponds (recently lined with geofabric, one anaerobic and two aerobic ponds, with a total storage capacity of 19.1ML).

A ramp up process is proposed that will involve processing at 50% capacity in month one, moving to 100% capacity in the following months. The ramp up process is proposed to verify wastewater quality. Operation is ultimately proposed for 9 – 10 months per year. The abattoir will shut-down over late December, January and February. General operating hours will be between 6am to 6pm Monday to Saturday. The Proposal will employ up to 40 people.

Figure 1 – Location of the Proposal (Source: NR Maps)



CONSULTATION

The NOI has been reviewed as a notification under the EA Act in consultation with Northern Territory Government (NTG) advisory bodies (see Attachment 1) and the responsible Minister, in accordance with clause 8(1) of the Environmental Assessment Administrative Procedures 1984 (EAAP).

JUSTIFICATION

The NOI was assessed against the NT EPA’s environmental factors and objectives. The NT EPA identified seven environmental factors (Table 1) that could be potentially significantly impacted by the Proposal. The NT EPA considered the importance of other environmental factors during the course of its assessment, however those factors were not identified as potentially significantly impacted.

Table 1 - Key environmental factors

Theme	Environmental factor	Objective
Air	1) Air quality and greenhouse gases	Maintain air quality and minimise emissions and their impact so that environmental values are protected.
People and Communities	2) Social, economic and cultural surroundings	Protect the rich social, economic, cultural and heritage values of the Northern Territory
	3) Human health	Ensure that the risks to human health are identified, understood and adequately avoided and/or mitigated.
Water	4) Hydrological processes	Maintain the hydrological regimes of groundwater and surface water so that environmental values are protected.
	5) Inland water environmental quality	Maintain the quality of groundwater and surface water so that environmental values including ecological health, land uses, and the welfare and amenity of people are protected.

Theme	Environmental factor	Objective
Land	6) Terrestrial flora and fauna	Protect the NT's flora and fauna so that biological diversity and ecological integrity are maintained.
	7) Terrestrial environmental quality	Maintain the quality of land and soils so that environmental values are protected.

1. Air Quality and greenhouse gases

Objective: Maintain air quality and minimise emissions and their impact so that environmental values are protected.

There are currently no nearby sources of industrial air emissions in the vicinity of the Proposal, however smoke from distant and local vegetation burning during the dry season contributes to regional emissions.

The Proponent identified a number of sources of potential odour emissions from the Proposal. These include the rendering plant, wastewater treatment ponds and manure stockpiles. The Proponent undertook an Odour Impact Assessment (OIA) using the New South Wales Technical Framework, Technical Notes and Approved Modelling Methods¹. Odour modelling predicted ground level concentrations from the rendering plant and wastewater treatment ponds:

- are below (meet) the OIA criteria of 7 odour units (OU) at the nearest rural residences (approximately 1.8km to the north of the abattoir and 2.2km east)
- are below (meet) the OIA criteria of 3 OU at the Batchelor township.

The Proponent has committed to employing management practices to minimise odour generation including removing manure offsite on a weekly basis; and implementation of an Odour Management Procedure.

Heavy and light vehicles have the potential to generate dust as they travel along a 1.8km gravel road to and from the Proposal. Potential impacts and risks associated with dust generating activities are proposed to be minimised in accordance with the environmental controls identified in the Air Pollution Management Plan. Vehicles and machinery will be kept in good working order and maintained appropriately to avoid excessive emissions. Vehicle speeds will also be monitored and drip bars will be used for dust suppression on unsealed surfaces to minimise dust generation on site. No further land clearing or construction activities are proposed.

Greenhouses gases will be generated in small volumes by vehicles travelling to and from the site. To avoid excessive emissions, vehicles will be serviced regularly and cattle will not be held on site for more than 18 hours. Power will be sourced from underground powerlines which operate 24 hours a day for all builds except the rendering plant which operates on liquefied petroleum gas. The Proponent states sustainable processes will be reviewed on an ongoing basis.

The NT EPA is satisfied that the potential impacts and risks to air quality and greenhouse gases can be mitigated through implementation of the management measures presented in the NOI; and consistent with advice from the Department of Environment and Natural Resources (DENR) Environment Division, an Environment Protection Licence under the Waste Management Pollution Control (WMPC) Act 1998 is required. Therefore, NT EPA considers that its objective for air quality and greenhouse gases is likely to be met.

¹ New South Wales Environment Protection Authority. 2017. Industrial Emissions. Available at <https://www.epa.nsw.gov.au/your-environment/air/industrial-emissions/managing-odour/technical-framework-odour> (accessed 11 July 2019).

2. Social, economic and cultural surroundings

Objective: Protect the rich social, economic, cultural and heritage values of the Northern Territory.

Social

Existing noise on site is generated from cattle and existing agricultural practices. Ambient noise levels are likely to increase from cattle, plant operations and light and heavy transport vehicles traveling to and from site.

The receiving environment is rural residential and the nearest residence is approximately 1.8km north of the abattoir. According to the NT EPA Northern Territory Noise Management Framework Guideline², the recommended maximum assigned noise level for residential receptors in the rural area is 50dB(A) during the day, 45dB(A) in the evening and 40dB(A) at night. In its NOI, the Proponent incorrectly applied noise values for industrial premises and estimated that noise from the Proposal will be at minimum, 90dB(A) during the day and 84dB(A) in the evening and at night. The main sources of noise are listed in the NOI as “existing agricultural practices” (84dB) and cattle (52dB and 79dB).

In its Supplementary information, the Proponent revised the calculated Proposal-specific noise amenity levels (based on the maximum assigned levels for rural residential receptors) to 45dB(A) (day), 40dB(A) (evening) and 35dB(A) (night). The noise assessment predicts a sound level of 65dB emitted at the abattoir will be attenuated to less than the Proposal-specific assigned noise level (35dB evening and night) at a distance of 32m from the noise source. The level will be less than 5dB at the Proposal boundary and inaudible at the nearest receptor over 1.8km away.

The Environmental Management Plan provides a number of management strategies for minimising the impact of noise on sensitive receptors including undertaking works only within agreed hours and employing noise abatement devices. The Proponent has committed to ongoing community consultation, monitoring, reviewing and reporting noise levels (including maintaining a complaints register).

In accordance with its Recommended Land-use Separation Distances guideline, the NT EPA recommends new abattoirs apply a 1km separation buffer to the nearest sensitive receptor. The NT EPA recognises that the Proposal site has previously been used as an abattoir and for cattle grazing for many decades. It is located greater than 1km from the nearest sensitive receptor. The noise sources are synonymous with rural activities and noise levels are anticipated to reduce over distance.

The DENR has identified the potential for odour and noise to impact nearby residents and has informed the Proponent that an application for an Environment Protection Licence is required.

Cultural heritage

There are several sacred sites located on the Proposal boundary which could be at risk of interference from the Proposal. These sites are protected under the Northern Territory Aboriginal Sacred Sites Act 1989. Within the Proposal site there is also a place of significance that is of cultural value to Aboriginal people. The Proponent has committed to apply for an Authority Certificate from the Aboriginal Areas Protection Authority prior to undertaking any works that could impact on Aboriginal sacred sites.

² Northern Territory Environment Protection Authority. 2018. Northern Territory Noise Management Framework Guideline. (ONLINE) Available at <https://ntepa.nt.gov.au/waste-pollution/guidelines/guidelines> (accessed 15 July 2019)

The NT EPA is satisfied that the potential impacts and risks to Social, economic and cultural surroundings can be mitigated through implementation of the management measures presented in the NOI. The NT EPA considers that its objective for social, economic and cultural surroundings is likely to be met.

3. Human health

Objective: Ensure that the risks to human health are identified, understood and adequately avoided and/or mitigated.

The nature of the Proposal and its proximity to seasonal streams and creeks makes it susceptible to mosquitoes. Drainage infrastructure, the meat processing plant and the wastewater treatment ponds have the potential to create mosquito breeding habitat. In order to minimise the risk of biting insects on site, the Proponent has committed that the abattoir will be managed to ensure compliance with the regulations of the Public and Environmental Health Act 2011.

Impacts on other groundwater users are not anticipated. There are no existing groundwater users within 2km of the Proposal or within the same aquifer as the Proposal.

The capacity and suitability of the onsite domestic wastewater management system was assessed by a hydraulic consultant. The consultant confirmed that the existing septic system has adequate capacity to service 40 staff. The consultant made a number of recommendations, including relocating the on-site wastewater disposal system 100m away from the domestic water bore in accordance with the Department of Health guidelines. The Proponent has committed to implementing these recommendations.

The NT EPA is satisfied that the potential impacts and risks to human health can be mitigated through implementation of commitments presented in the NOI. The NT EPA considers that its objective for human health is likely to be met.

4. Hydrological processes and Inland water environmental quality

Hydrological process objective: Maintain the hydrological regimes of groundwater and surface water so that environmental values are protected.

Inland water environmental quality objective: Maintain the quality of groundwater and surface water so that environmental values including ecological health, land uses, and the welfare and amenity of people are protected.

The Proposal is located within the Finnis surface water catchment area and within the Declaration of Beneficial Uses Fog Bay Area³. The beneficial uses are aquatic ecosystem protection and recreation water quality and aesthetics. Surface water drainage from the abattoir drains across the site in a westerly direction into a minor tributary (approximately 390m from the abattoir and 100m from the wastewater treatment ponds) which flows into the Finnis River.

Wastewater is generated from the abattoir, rendering process and septic system. Wastewater flows from these sources and travels via the in-ground pipework to the wastewater treatment ponds located to the west of the abattoir. The total quantity of wastewater entering the ponds from all day to day activities is 0.9ML per week (based on 10% system losses). All wastewater leaving the abattoir drains to the 0.25mm Contra-Shear, where it is screened before overflowing to the wastewater treatment ponds. Materials greater than 0.25mm are sent to the rendering plant for reprocessing. The wastewater treatment ponds have a combined total capacity of 70ML

³ Northern Territory Government. 1998. Northern Territory Government gazette: no. G9. (ONLINE) Available at: http://www.territorystories.nt.gov.au/jspui/bitstream/10070/224127/1/EJ_NTGG_1998_G09.pdf (accessed 22 July 2019)

with 0.5m freeboard and were previously lined with a clay bentonite layer, and recently lined with geofabric. Approximately 35ML of wastewater per year will be generated.

Water treated through contra-shear and wastewater treatment ponds is pumped to a 150KL water tank, and is proposed to be used for stockyard washing and dust suppression on the gravel roads. No processing water will be applied to pastures. Blends of commercial treatment micro-organisms will be added to the anaerobic pond on a daily basis to enhance pond efficiency. The action of these micro-organisms is reputed to assist in reducing the build-up of sludge in the anaerobic pond, thus reducing the frequency of sludge removal.

In the event of a significant storm event during the wet season, the last pond in the wastewater treatment system has the potential to overflow into the upper Finniss River Catchment from the minor tributary adjacent to the ponds. This is however unlikely to occur as the ponds have a total capacity of 70ML, twice the annual requirement of water anticipated to be received from the abattoir (35ML).

An environmental monitoring program will be undertaken including regular monitoring of the water treatment ponds, groundwater bores and surface water to detect changes in quality. An annual Environmental Monitoring Report outlining the overall environmental performance of the abattoir will be routinely completed and reported to the NT EPA as a requirement of an Environment Protection Licence under the WMPC Act.

Water for the abattoir will be sourced from an onsite bore (RN007771) which has a capacity of 5L/s. There are no existing groundwater users within 2km of the Proposal, or within the same aquifer so impacts to other groundwater users are not anticipated. Water quality of RN007771 meets the Australian Drinking Water Guidelines (2016).

The total quantity of water required for the Proposal is 1ML/week (approximately 38.5ML/year) for operation at maximum capacity (160 head per day/five days a week). Of this, 6kL per week is required for drinking water and accommodation for staff and 994kL per week is required for cleaning cattle yards, filling cattle troughs, abattoir and rendering plant processes. A water balance has been provided in the Water Management Plan.

The NT EPA is satisfied that the potential impacts and risks to hydrological processes and inland water environmental quality can be mitigated through implementation of the management measures presented in the NOI. The NT EPA considers that its objectives for Hydrological processes and Inland water environmental quality are likely to be met.

5. Terrestrial flora and fauna

Objective: Protect the NT's flora and fauna so that biological diversity and ecological integrity are maintained.

The Proposal lies in close proximity to the Litchfield National Park and Finniss River Coastal Floodplain Site of Conservation Significance.

The site has been used as an abattoir and for cattle grazing since the 1960s and is heavily disturbed. Vegetation on site has largely been cleared. No further clearing is proposed. Pockets of woodland and riparian rainforest remain adjacent to wet season flowing tributaries located to the west and south of the Proposal. While riparian vegetation is considered to be sensitive/significant, it is not expected to be impacted as it falls outside of the proposed operational area.

Impacts to flora and fauna are not anticipated given the site has already been cleared and developed and no further clearing is proposed.

The Flora and Fauna Division considers that the site is unlikely to support populations of threatened species or contain important habitat. As such, there is a very low risk that the proposed activity will have a significant impact on the values associated with the Terrestrial flora and fauna factor.

Historical disturbance across the site has allowed for the establishment and proliferation of weeds. Thirteen declared weeds under the Weeds Management Act 2001 have been recorded on site. There is potential for the Proposal to result in the further introduction and spread of weed species via machinery and transport of cattle and cattle feed to site and export of products off site. To mitigate this risk, the Proponent has committed to developing a Weed Management Plan. The DENR Weeds Branch support the development of a Weed Management Plan, particularly to address the ongoing control of mimosa and prickly acacia which are the most significant weeds of concern in the area.

The NT EPA is satisfied that the potential impacts and risks to terrestrial flora and fauna can be mitigated through implementation of the management measures presented in the NOI. The NT EPA considers that its objective for Terrestrial flora and fauna is likely to be met.

6. Terrestrial environmental quality

Objective: Maintain the quality of land and soils so that environmental values are protected.

The Proposal is situated on gently undulating plains with moderately well to well-drained soils surrounded by rugged terrain with slopes greater than 9% to the north-east and south-west of the Proposal. Soils on site as regarded as highly erodible (hydrosols). The transport of cattle and light vehicle movement on site, water management infrastructure, and surface water run-off from stockyard washing and dust suppression activities has the potential to cause or increase erosion on site. To mitigate these impacts the Proponent has prepared an Erosion and Sediment Control Plan (ESCP) that includes detailed control measures for the operational phase of the Proposal. As per the ESCP, clean water will be diverted around the base of the ponds via the diversion banks and channelled into adjacent water courses. Surface and road run-off will be directed away from drainage lines.

Waste will be generated in both liquid and solid from the abattoir, maintenance works, office and rendering plant. The Proponent has developed a site based Waste Management Plan which provides an inventory of waste materials expected to be produced by the Proposal, estimated volumes and compositions of wastes and describes measures to manage the various waste streams. It is expected that waste can managed appropriately through implementation of the Waste Management Plan.

The storage and use of various chemicals on site has the potential to result in spills or leaks, leading to soil contamination. To manage this risk, the Proponent has committed to ensuring that all fuels, oils, chemicals and lubricants are stored and handled appropriately. The EMP also includes measures for appropriate storage and disposal of contaminated soil (in the event of a spill).

The NT EPA is satisfied that the potential impacts and risks to terrestrial environmental quality can be mitigated through implementation of the management measures presented in the NOI. The NT EPA considers that its objective for Terrestrial environmental quality is likely to be met.

CONCLUSION

The NT EPA considers that the potential environmental impacts and risks associated with the Proposal are not significant and that the Proposal does not require assessment under the EA Act.

Comments from NTG advisory bodies have been provided to the Proponent and the NT EPA has provided recommendations to the Proponent to ensure that potential impacts on the environment are minimised and responsibilities under the legislation can be met.

DECISION

The proposed action, which was referred to the NT EPA by Central Agri Group, has been examined by the NT EPA and preliminary investigations and inquiries conducted. The NT EPA has decided that the potential environmental impacts and risks of the proposed action, if implemented through preparation and implementation of procedures and management plans specified in the NOI, are not so significant as to warrant environmental impact assessment by the NT EPA at the level of a Public Environmental Report or Environmental Impact Statement, under provisions of the EA Act. Environmental management of the potential environmental impacts is the responsibility of Central Agri Group, in accordance with commitments made in the NOI and an Environment Protection Licence under the WMPC Act.

This decision is made in accordance with clause 8(2) of EAAP, and subject to clause 14A the administrative procedures are at an end with respect to the proposed action.

A handwritten signature in blue ink, appearing to read 'P. Vogel', is written over a horizontal line.

DR PAUL VOGEL AM MAICD

CHAIRMAN

NORTHERN TERRITORY ENVIRONMENT PROTECTION AUTHORITY

25 OCTOBER 2019

Attachment 1: Northern Territory Government Advisory bodies consulted on the Notice of Intent

Department	Division
Department of Environment and Natural Resources	Flora and Fauna Water Resources Weeds Environment Bushfires NT Rangelands
Department of Infrastructure, Planning and Logistics	Planning Transport and Civil Services Infrastructure
Department of Primary Industry and Resources	Mining Compliance Petroleum Primary Industry Fisheries
Department of Tourism, Sport and Culture	Parks and Wildlife Heritage Tourism NT Arts and Museums
NT Police, Fire and Emergency Services	Business Improvement and Planning
Department of Health	Environmental Health Medical Entomology
Department of Trade, Business and Innovation	Economics and Policy Strategic Policy and Research
Department of Local Government, Housing and Community Development	Maintenance Planning Housing supply
Power and Water Corporation	
Aboriginal Areas Protection Authority	Technical
Department of the Attorney-General and Justice	Commercial Division NT Worksafe
Land Development Corporation	
Department of the Chief Minister	Economic and Environmental Policy Social Policy