

Our Reference: 23919.83106  
Your Reference: NTEPA2015/0064



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Dear Paul,

**Re: Response to Comments on Draft EIS for Wellard Darwin Integrated Live Export Facility (ILEF)**

Thank you for your prompt supply of the NT EPA's comments of the draft EIS. We appreciate the consolidation of other respondents' comments to the advertising of the draft EIS for the Darwin Integrated Live Export Facility (ILEF).

We have had an opportunity to review those comments.

The development and its EIS have been proposed by Wellard Rural Exports Pty. Limited (Wellard's) and prepared by EnviroAg Australia Pty. Limited (EnviroAg). The proposed Wellard Darwin ILEF development has undertaken specialist assessments

Stage 1 of the Wellard Darwin ILEF is for a 1,814 Standard Cattle Unit (SCU) facility (normalised capacity against a peak holding capacity of 12,000 SCU). Stage 1 of the ILEF is a modest development. Stage 2 is subject to further assessments allowing the same.

A formal "Supplement" has been provided. It attends to the supply of additional information and clarifications that may have been needed. I refer you to Table 1 below. It sets out each respondent to the draft EIS and issues raised; and the related response.

In support of the supplement we have provided a direct response to each Department, agency or person. Please can the NT EPA, as the process owner, send a copy of each direct response to those respondents?

Wellard and EnviroAg Australia have taken this initiative because of;

- (a) Third party advices,
- (b) Our concern with regard to the level of understanding of the project expressed by the responses,
- (c) Need to provide a comprehensive response for the respondent, and,
- (d) The need to expedite the approvals process where possible and to remove any hindrances to the same.

Our responses have been tabulated against the following document listing.

**Table 1 Respondent Document Reference Table**

<b>Doc</b>	<b>Respondent</b>	<b>Notation</b>
A	NT EPA	<b>See Response to Document A</b>
B	Police, Fire and Emergency Services	<i>“proponent should engage with the NT Fire and Rescue Service in the certification process prior to the construction of any buildings at the project site”.</i>
C	Public Comment (Mr Glenn Spiers)	<b>See Response to Document C</b>
D	Department of Land Resource Management.	<b>See Response to Document D</b>
E	Department of Health – Environmental Health Branch’s	<b>See Response to Document E</b>
F	Department of Transport	<b>See Response to Document F</b>
G	Department of Lands, Planning and the Environment	<b>See Response to Document G</b>
H	Parks and Wildlife Commission	<i>“Parks and Wildlife Commission is satisfied that there is no likelihood of detrimental impact to the natural, cultural or tourism values within our National Parks estate.</i>
I	Department of Infrastructure	<b>See Response to Document I</b>
J	Department of Business	<i>“Does not have any major issues” “this project would provide socio-economic benefits to the region as wells as the broader Territory economy”.</i>
K	Power and Water Corporation	<i>“No comments from PWC”...</i>
L	Tourism NT	<b>See Response to Document L</b>

The direct response to the NT EPA Comment is provided in the attachment “Response to Document A”. It is noted that the NT EPA comments contain potential “inconsistencies”.

We have endeavoured to provide factual responses that are referenced. (*“It allows you to debunk incorrect claims or provide alternatives to components of the projects to inform a better environmental outcome”* (Alana Mackay, email 2<sup>nd</sup> December 2015)).

On behalf of Wellard, EnviroAg has obtained further advices from third parties to support its response.

We note the following;

1. The Northern Territory Government has explicitly excluded pre-export quarantine developments from the National Feedlot Guidelines (2<sup>nd</sup> Edition, 2007). This exclusion is clearly stated in the National Guidelines for Beef Cattle Feedlots in Australia (3<sup>rd</sup> Ed, 2012).
2. The Northern Territory Government has no guidelines for the siting, design, establishment and management of pre-export quarantine livestock facilities.
3. Pre-export quarantine livestock depots have some common land uses with a beef cattle feedlot or saleyard but have an entirely different production system when compared with a “production” feedlot, saleyard or meat processing facility (abattoir). Occupancy is different, rations fed are different, manure production is different, and housing systems are different. Please see Attachment 2.
4. EnviroAg has liaised with Meat and Livestock Australia and LiveCorp in regard to the status of research and development on environmental management of pre-export quarantine facilities. MLA has acknowledged that no data exists on the environmental management (and odour generation and emissions) from pre-export quarantine facilities (please see Attachment 3).

5. It has been confirmed that no applicable international and national research data exist on the environmental management and odour generation and emission rates from pre-export quarantine depots.
6. The draft version of the EIS for the proposed Wellard facility at Livingstone has applied the highest standard of assessment.
7. Where appropriate it has applied applicable parts of the National Guidelines for Beef Cattle Feedlots in Australia (3<sup>rd</sup> Ed, MLA, 2012). Not all of this guideline is applicable.
8. Components of guidelines for feedlots have been used for the purposes of designing environmental engineering aspects of the facility and to manage any potential environmental impacts. This conservative approach to design and ongoing management has been adopted in the absence of any pre-existing regulations or governing legislation underpinning the same.
9. EnviroAg and its present and past staff have been the lead author and a principal contributor to all 3 Editions of the National Guidelines for Beef Cattle Feedlots in Australia. Accordingly, EnviroAg can be considered as a leading authority in the design and environmental management and monitoring of intensive cattle husbandry operations in Australia.
10. Design changes that have been made to accommodate comment received during the consultation phase (particularly those from DLPE, NTEPA and DLRM). These include;
  - a. Reduced capacity of facility;
  - b. Movement of the facility south away from the northern boundary;
  - c. Reduction of the management / composting areas;
  - d. Inclusion of significant tree-lines within the property
  - e. Realignment of odour generating elements; such that separation distances fall within the property boundaries.

Accordingly, many of the comments raised by respondents (addressed here and in attachments) are no longer relevant. (Refer to Attachment 4).

If you have any further query please contact EnviroAg Australia at the earliest convenience.

Yours faithfully,



Dr Simon Lott  
Specialist Engineer  
EnviroAg Australia Pty Limited

**Attachments:**

- Attachment 1 – Cross Reference Table for “Supplement” and Respondent
- Attachment 2 – Briefing Note: Comparison of Agricultural Production Systems
- Attachment 3 – Formal Letter from Meat and Livestock Australia
- Attachment 4 – Briefing Note – Project Profile
- Attachment 5 – Briefing Note: Mathematical Calculation Sheet and Graphs – Normalisation of Herd Capacity