

NORTHERN TERRITORY ENVIRONMENT PROTECTION AUTHORITY COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

WELLARD RURAL EXPORTS PTY LTD - LIVINGSTONE INTEGRATED LIVE EXPORT FACILITY - DECEMBER 2015

Relevant section / topic	Comment
<i>Waste Management and Pollution Control Act</i>	The Integrated Live Export Facility (ILEF) will generate beef cattle effluent as part of the operations. “Animal effluent and residues (abattoir effluent)” is a listed waste under Schedule 2 of the <i>Waste Management and Pollution Control (Administration) Regulations</i>. Current treatment and disposal options comprise the irrigation of treated effluent to pasture and onsite composting of manure generated from pens, yards, trucks, sediment basin, truck wash and occasionally cattle carcasses. It is likely that such activities would require an environment protection approval to construct the wastewater and composting treatment system and an environment protection licence to store, treat and dispose of animal effluent and residues under the <i>Waste Management and Pollution Control Act</i>. Composting and reuse of manure is consistent with the waste hierarchy principles. The Supplement to the draft Environmental Impact Statement (the Supplement) should outline beneficial reuse criteria, including the proposed level of treatment that can be achieved by windrow composting and associated reuse options for the end product.
Solid waste management and separation distance	The major solid waste management activity is the composting of animal manure, sludge, animal bedding, food wastes and carcasses. The effectiveness of methods used for composting are impacted strongly by the proposed management of water quality and potential for contamination, odour management requirements, and proposed separation distances. The EPA Victoria Guidelines¹ on separation distances for industrial residual emissions to air recommend a separation distance of 500 m for temporary holding, transport, sale or processing of stock. It should be noted that this type of facility does not include waste water ponds, waste water treatment or irrigation using odoriferous waste water. The presence of these additional facilities and methods for composting may require consideration of a larger separation distance. These include consideration of the following: • total mass of materials to be processed per year • relative mass/volume of the materials to be composted (e.g. manure, sludge, carcasses, food wastes, animal bedding, etc.) • pasteurisation procedures (e.g. pathogen, plant propagule control, etc.) • reasons for not using aerated ponds or preferably enclosed anaerobic treatment (less odoriferous than anaerobic and

¹ Environment Protection Authority Victoria, 2013. *Recommended separation distances for industrial air emissions*, Publication number 1518, Carlton, Victoria.

	usually required) • assessment of the effects of local topography on odour plumes • assessment of local meteorology, including high frequency localised events • quality of clay to be used for pads and compost base, i.e. should have a hydraulic conductivity of 1×10^{-9} m/s for fresh water and 50 000 ppm NaCl solution • physical protection of composting to protect the clay base from dehydration, cracking, and physical damage from composting activities • source of non-contaminated water for keeping compost moist following pasteurisation (e.g. does the proposed use of water from the anaerobic open pond treatment conform?).
Risk Assessment	The objective of project specific risk assessment is to ensure that significant risks are identified and evaluated such that appropriate risk treatment can be implemented to mitigate risks. Risk assessment provides a mechanism to demonstrate to stakeholders that the project's environment risks are recognised, and that treatment measures are developed to adequately reduce risks to acceptable levels during the execution of a proposed action. The Northern Territory Environment Protection Authority (NT EPA) requires an EIS to be undertaken in a risk assessment framework. The framework as defined by the International Organisation for Standardisation ISO 3100:2009 Risk Management – Principles and Guidelines, is as follows: 1. Establishment of context 2. Risk identification 3. Risk analysis 4. Risk evaluation 5. Risk treatment 6. Monitoring and review 7. Communication and consultation. When compared to the above framework, the draft EIS establishes the context; and discusses suggested risk treatment, monitoring and review and communicating and consultation throughout the remainder of the draft EIS. However, the credibility of the output of these processes is contingent on the procedures being used correctly and thoroughly. This involves clearly defined steps from ISO 3100:2009, which start with a statement of the objective/s of a particular analysis, the context of the analysis, definition of the risk criteria to be used, and in semi-quantitative/quantitative analyses, use of likelihood and consequence to provide ratings of the risk to attainment of the particular objective/s. Corporate objectives (e.g. reputation, finances, etc.) and identification of sensitive receptors, contaminant pathways, events, event frequencies, are also considered

	relevant. All steps must be included to provide a rigorous outcome. The rigour of the analysis is dependent on articulation and use of clearly substantiated justifications for the levels of likelihood and consequence used to determine risk to objectives, and similarly expressed justification for likelihood and consequence in determining the effectiveness of mitigation and subsequent residual risk. The level of uncertainty associated with the justifications needs to be addressed. The NT EPA identified that the risk assessment for the ILEF applied poorly defined risk criteria and there was an absence of appropriate justification for the levels of likelihood and consequence chosen. Public confidence in the outcomes of the risk assessment is critical. It is recommended that the risk assessment for the ILEF be revised in its entirety to ensure that the risk assessment framework is clearly defined, executed and presented. The assessment needs to identify the nature of the risks and potential impacts; assess the effectiveness of the proposed mitigation and management measures; and provide sufficient information to allow the decision-makers to understand whether or not the Project will have unacceptable impacts on the environment. Items to consider include: • the majority of risk assessments were conducted using a single hazard with multiple potential sensitive receptors, and arrived at a single risk value with limited explanation of how this could be done given the probably widely ranging likelihood and consequence values for each of the receptors (e.g. transport of cattle in relation to odour, dust, noise, traffic, weeds, vermin, and greenhouse gases, etc.). There should have been separate objectives for each receptor for each hazard, and risks for each receptor summed across the various hazards involved. This would allow full assessment of risk to objectives and allow provision of appropriate mitigation and monitoring as required. • avoiding assessments involving more than one hazard with likely differing likelihoods and consequences (e.g. surface runoff/spills of effluent to surface water) • improper identification/confusion of hazards and potential impacts (e.g. biting insect breeding is classed as a hazard and insect bites as a consequence. The hazard is creation of breeding sites for biting insects, and the impact is large numbers of biting insects and lots of bites. This allows for the risk to be subject to mitigation via management of habitat) • incomplete identification and assessment of hazards (e.g. application of irrigation at varying rates, and nutrient levels in irrigation water, etc.) • where a single sensitive receptor is subject to potential impacts from more than one hazard, the risks of impacts from each source of impact must be assessed separately, and the level of cumulative risk to the receptor determined; usually through summation of risk estimates.
Water quality	The risks to water quality have broadly been identified and considered in the draft EIS. However, a more comprehensive assessment of the Project's potential risks to the quality and quantity of the receiving groundwater and surface water systems, including the downstream recreational areas and Darwin Harbour, should be provided in the Supplement. At a minimum, an evaluation of the contaminants and microbiological pathogens from the Project potentially entering the waterways and/or

	aquifer and risk mitigation and monitoring should be provided.
Seasonal Inundation	The north-western corner of the site is currently subject to seasonal inundation, receiving significant input from discharges from the superficial aquifer. The drainage system seems unlikely to eliminate the transport of water in the superficial aquifer to the north-western corner. There are risks associated with the discharge of groundwater in the north western corner (including nutrient and salt contaminated water from the irrigation area). The Supplement should include an assessment of how this affects the integrity of the two water storages in this area and proposed uses of this water. Appropriate mitigation/management measures should be provided.
Irrigation	The Environmental Management Plan should include an Irrigation (Waste Water) Management Plan, which outlines measures for ensuring waste water produced during operation is managed in a way that protects the environmental values and beneficial uses of surface and groundwater resources during both Wet and Dry seasons. The Irrigation (Waste Water) Management Plan should include: • thresholds and criteria for wastewater and outline the additional mitigation measures in the event that the thresholds / criteria are exceeded • results from studies/assessments of anticipated water quality likely to be used for irrigation • rates of application of irrigation water • measures to manage excess nutrient and salt input and associated odours at various times of year • the predicted rates of build-up of salts • the estimated rates of leaching of nutrients/salts to surface water during the Wet season • the estimated rates for nutrients/salts to leave the site associated via the high transmissivity of the superficial aquifer • assessment of plant growth, nutrient uptake or harvest frequency • monitoring program and water quality criteria.
Odour Assessment	A key environmental risk associated with the ILEF relates to offsite impacts from odour on residents in nearby rural properties. The Odour Assessment provided as part of the draft EIS was preliminary and based on a number of assumptions that require further consideration in the Supplement, which include but are not limited to: • There was limited data and discussion on odour generation, modelling, management and monitoring, or on waste water/irrigation water modelling, management or monitoring. Odour modelling is essential to confirm or invalidate the proposed separation distance. This is particularly important given the Environment Protection Authority Victoria

	Guidelines² on designing, constructing and operating compost facilities indicate that composting of green waste (far more benign than the material proposed for this project) would require a separation distance of up to 2 km if composting was to be conducted in the open air (depending on mass processed per year). The guidelines recommend that composting of the materials proposed should be conducted in an enclosed space (on concrete), and is likely to require odour controls. Without this information, it is difficult to assess the adequacy of the risk assessment and the mitigation / management measures. • The Odour Assessment proposes the use of standardised cattle units based on the number of animals in the yard and the time the animals are held. The average number of cattle units is then used to conclude what Level of assessment is required. Given that operations will require rapid stocking and destocking of large numbers of cattle on the site there is potential for short periods of odour nuisance. The Supplement should provide justification for using averages as a 'normalised stocking rate'. The Supplement should outline whether the timeframe used in Figure 3 and 4 of Appendix C is adequate to fully consider human odour perception. The Supplement should justify why other methods that take into consideration temporal scales that are more relevant to human odour perception (i.e. peak to mean factors) were not used to determine average SCU. • The Odour Assessment stated that "<i>Odour from waste water ponds are considered to be part of the feedlot complex that is assessed in any separation distance calculation</i>". There is published evidence that holding ponds and sediment basins produce odour emissions (Henry et al 2012³). Given that there is potential for the holding ponds to produce odours, the Supplement should outline how the 'modified separation distance calculation' takes into account the ponds (see chapter 5 of Appendix C). • The odour assessment should include the irrigation area. • The odour framework outlined by the NSW EPA (Department of Environment and Conservation NSW 2006⁴) provides for a number of assessment procedures designed to progress in complexity and reduce uncertainty (moving from a Level 1 assessment, through Level 2 to Level 3). This framework is designed to account for project demands and ensure that the most complex situations are supported by more robust odour assessments. It is noted that limited availability of data restricts the ability to undertake dispersion modelling studies (i.e. a Level 2 or Level 3 odour assessment), yet in the case of the ILEF, the absence of information on odour emission rates and suitable meteorological information does not justify the use of a Level 1 assessment: ○ Wind information exists for the Noonamah and Middle Point weather stations. Given these data exist and are more relevant climatically to the ILEF, outline why data from Darwin Airport was used rather than these
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² Environment Protection Authority Victoria, 2014, *Draft Guideline – Composting*, Publication number 1577, Carlton, Victoria.

³ Henry, C.G., Watts, P.J., Nicholas, P.J., 2012, The Development of Industry-Specific Odor Impact Criteria for Feedlots using Models, *Journal of the Air and Waste Management Association*, 58:((9):1177-1186

⁴ Department of Environment and Conservation NSW, 2006, *Technical framework – Assessment and management of odour from stationary sources in NSW*, Sydney.

	datasets. ○ With respect to the availability of information on odour emission rates, there are a number of published studies quantifying odour emissions from feedlots and manure pads using a range of techniques. While it is preferred that odour emissions data are derived from (see review by Henry et al 2012⁵) measurements that are assumed to be representative of the development, the use of published data may serve as a proxy for these measurements. • There are concerns that the Level 1 assessment does not fully address the potential impacts of seasonality of emissions/impacts or consider future land uses. The Supplement should provide additional information (or a Level 2 assessment) to properly address these matters. • The matter of cumulative odour impacts has not been adequately addressed. Section 7.7.4 of the draft EIS proposed the establishment of an “agricultural business precinct” and notes that there are currently neighbouring operations that have some aspect of animal husbandry. These operations are highly likely to generate odours that may contribute to a cumulative impact. The Supplement should include further clarification and justification with respect to existing sources of odour and include a revised odour assessment outlining how the ILEF will contribute to cumulative odour emissions in the Livingston Locality.
Section 7.7.2 Table 13	A buffer width of 496.4 m was recommended in the draft EIS. The buffer was based on the cumulative impact separation distance calculation, which assumed completion of upgrades at the adjacent Santavan facility. Details of how the Santavan facility will be upgraded and appropriate discussion regarding how the upgrades affect the separation distance calculations should be provided in the Supplement.
Page ii	The draft EIS notes: “<i>The pre-quarantine export yard is covered. The open feedlot will not be operated during the wet season (per se) and will be cleaned prior to the wet so there will be no manure pack to generate significant amounts of offensive odours</i>” The Waste Management Plan does not detail what will happen to the manure pack prior to the Wet Season and after compost has been removed. Given that all compost is planned to be removed from the site prior to the Wet Season, please update the Waste Management Plan to identify whether the manure pack will be stored onsite or transported offsite for disposal. If the manure storage/composting pad is uncovered, outline what measures will be used to maintain composting conditions during the Wet Season as per Table 11.
Section 7.9.3	The draft EIS stated: “ <i>Maximum acceptable increases of dust will be 1 or 2 g/m²/month over pre-existing levels (Cattle and Elias 2003)</i> ”.

⁵ Henry, C.G., Watts, P.J., Nicholas, P.J., 2012, The Development of Industry-Specific Odor Impact Criteria for Feedlots using Models, *Journal of the Air and Waste Management Association*, 58:(9):1177-1186

	The reference list in the draft EIS does not include 'Cattle and Elias 2003' and searches for this publication were unsuccessful. Provide this publication, or alternatively provide different evidence to support the 'proposed acceptable increases of dust', in the Supplement.
Section 3.6.2	The draft EIS stated that <i>"the "standard cattle unit" (SCU) is for a 600 kg animal held full time in a yard. The SCU unit is used to define manure build up rates, manure moisture contents and likely odour generation rates. Given a peak holding capacity of 12,000 SCU then the real full time equivalent capacity of the PEQ yard is 3,000 SCU"</i>. The National Beef Cattle Feedlot Environmental Code of Practice⁶ outlines the method to be used for determining SCUs and states: <i>"At any point in time, the <u>total</u> number of SCU in a feedlot can be calculated by multiplying the number of cattle in the feedlot by a scaling factor that allows for adjustments for differences in the size of cattle..."</i> Given that the facility will have a peak holding capacity of 12,000 SCU, the method used to calculate the <i>"real full time equivalent capacity"</i> (3,000 SCU) appears to differ from what is described in the National Beef Cattle Feedlot Environmental Code of Practice. In the Supplement, provide examples of other facilities where the Cattle Units have been standardised based on the holding period and any research or evidence that this method is appropriate.
Section 7.3.3	Inclusion of on-site burial of dead cattle can be problematic, primarily because dead cattle can pose a significant risk to groundwater without adequate mitigation measures. All animal disposals should at a minimum have guaranteed requirements of lining of pits with appropriate clays.
Section 3.11.3	The draft EIS stated that <i>"the general hours of operation for the proposed facility would be 5 am to 9 pm for the incoming and outgoing trucks delivering stock to the facility"</i> . The draft EIS did not detail the potential for operations outside these times, especially in relation to stock offloading and/or reloading onto trucks at the facility. This information is relevant to the operation of the facility and should be included in the Supplement.
Section 7.1.2	The draft EIS claimed that <i>"dust and noise are likely to be similar to odour in terms of buffer zones and cumulative effects, given that the main sources of these impacts are the same"</i> . This is a generalised statement and should be supported by evidence.
Section 7.1.2	The draft EIS provided conflicting information in respect of the amount of water that will be extracted for the ILEF. For example, extraction rates of 200 ML and 250 ML per year were provided. The amount of water to be extracted for the ILEF should be clarified in the Supplement.
Section 7.7.3	Section 4 of the Environmental Management Plan (EMP) should be updated so it is in a form that can be readily used for operational purposes. In particular, the EMP should have specific thresholds for when staff will undertake specific mitigation

⁶ Meat and Livestock Australia Limited, 2012. *The National Guidelines for Beef Cattle Feedlots in Australia*, 3rd ed. Sydney, NSW.

	and emergency procedures (e.g. what threshold does lime need to be added to wastewater to adjust the pH? etc.). In addition, the EMP sets out performance objectives and in some cases monitoring against those objectives. One example is the Water Quality Management Plan which includes performance objectives related to the presence of contaminants in surface and groundwater resources. Without relevant baseline information, it will be difficult, if not impossible to determine whether contaminants in surface/groundwater are attributable to the ILEF or other agricultural activities in the catchment (Santavan etc.).
Section 7.11.3	The Department of Natural Resources, Environment and the Arts (NRETA) no longer exists. The Department of Lands Planning and the Environment (Heritage Branch) is now responsible for administering the <i>Heritage Act</i>.
Section 7.11.4	The draft EIS stated “<i>The Aboriginal Areas Protection Authority assessed the proposed site and found no sites of aboriginal heritage significance present. As such, there is a high degree of confidence in the predicted outcomes</i>”. It should be noted that the Aboriginal Areas Protection Authority is responsible for administering the <i>Northern Territory Aboriginal Sacred Sites Act</i>. This Act identifies and protects specific Sacred Sites in the Northern Territory. All other Aboriginal Heritage items are protected under the <i>Heritage Act</i> regardless of whether those items have been identified.
Section 7.16	The draft EIS stated “<i>This development proposes to share the access with AA Co. as this is a stipulation set out by the Department of Transport in the terms of reference (Appendix U)</i>”. The Terms of Reference do not stipulate that the traffic arrangements are to be shared with the AA Co. operations. It is recommended that this statement is be corrected or clarified to ensure there is no confusion about this claim.

Sarah Grady

From: Matthew Barnes <Matthew.Barnes@nt.gov.au> on behalf of eia NTEPA <eia.NTEPA@nt.gov.au>
Sent: Friday, 11 December 2015 5:02 PM
To: 'Bernie Brosnan'
Cc: David Rhind; Alana Mackay; Sarah Grady; Simon Lott
Subject: FW: Draft Environmental Impact Statement for Comment - Wellard Rural Exports - Integrated Live Export Facility

Dear Bernie,

We have received the following comments from the Police, Fire and Emergency Services regarding the proposed ILEF.

Please acknowledge receipt of this email. This is my last day for the year so Merry Christmas and Happy New Year.

Kind Regards,

Matthew Barnes | Assessment Officer | Environmental Assessment Unit
Northern Territory Environment Protection Authority
p: (08) 8924 4050 | f: (08) 8942 6554
e: matthew.barnes@nt.gov.au | www.ntepa.nt.gov.au

The Avenue, Level 2, Suite 201
12 Salonika Street, Parap, NT 0820
GPO Box 3675, Darwin NT 0801



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From: Melinda Hull
Sent: Friday, 11 December 2015 4:27 PM
To: eia NTEPA
Subject: RE: Draft Environmental Impact Statement for Comment - Wellard Rural Exports - Integrated Live Export Facility

Dear David,

Thank you for the opportunity to review this draft Environmental Impact Statement and to attend the proponent's presentation on the 27 November.

The Northern Territory Police, Fire and Emergency Services have reviewed this draft Environmental Impact Statement and have not identified any issues at this stage.

Kind regards,

Melinda Hull | Staff Officer
Office of the Commissioner of Police and CEO of Fire and Emergency Services | NT Police, Fire and Emergency Services

6th Floor NAB Building, 71 Smith St, Darwin
PO Box 39764, Winnellie NT 0821
p... (08) 8985 8840 | e... melinda.hull@pfes.nt.gov.au | www.nt.gov.au/pfes

Working in partnership with the community to ensure a safe and resilient Northern Territory.

Sarah Grady

From: David Rhind <David.Rhind@nt.gov.au> on behalf of eia NTEPA <eia.NTEPA@nt.gov.au>
Sent: Tuesday, 15 December 2015 1:22 PM
To: B.brosnan@wellard.com.au
Cc: Sarah Grady; Simon Lott; rpillow@bigpond.com; Matthew Barnes; Alana Mackay
Subject: FW: Draft Environmental Impact Statement for Comment - Wellard Rural Exports – Integrated Live Export Facility

Hi Bernie

An additional comment was sent by Police Fire and Emergency Services on Friday afternoon and is attached below. Could you please acknowledge receipt of this correspondence.
Kind regards

David

David Rhind | Senior Environmental Assessment Officer
Northern Territory Environment Protection Authority
p: (08) 8924 4047 | f: (08) 8924 4053 |
e: David.Rhind@nt.gov.au | www.ntepa.nt.gov.au

The Avenue, Level 2, Suite 201
12 Salonika Street, Parap NT 0820
GPO Box 3675, Darwin NT 0801



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From: Melinda Hull
Sent: Friday, 11 December 2015 5:00 PM
To: eia NTEPA
Cc: Katherine Van Gorp
Subject: FW: Draft Environmental Impact Statement for Comment - Wellard Rural Exports – Integrated Live Export Facility

Good afternoon,

Further to my earlier email this afternoon, we advise that the 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 (as suggested in the document).

Kind regards,

Melinda Hull | Staff Officer

Office of the Commissioner of Police and CEO of Fire and Emergency Services | NT Police, Fire and Emergency Services
6th Floor NAB Building, 71 Smith St, Darwin
PO Box 39764, Winnellie NT 0821
p... (08) 8985 8840 | e... melinda.hull@pfes.nt.gov.au | www.nt.gov.au/pfes

Working in partnership with the community to ensure a safe and resilient Northern Territory.

From: Hull, Melinda

Sent: Friday, 11 December 2015 4:27 PM

To: NTEPA, eia

Subject: RE: Draft Environmental Impact Statement for Comment - Wellard Rural Exports – Integrated Live Export Facility

Dear David,

Thank you for the opportunity to review this draft Environmental Impact Statement and to attend the proponent's presentation on the 27 November.

The Northern Territory Police, Fire and Emergency Services have reviewed this draft Environmental Impact Statement and have not identified any issues at this stage.

Kind regards,

Melinda Hull | Staff Officer

Office of the Commissioner of Police and CEO of Fire and Emergency Services | NT Police, Fire and Emergency Services
6th Floor NAB Building, 71 Smith St, Darwin
PO Box 39764, Winnellie NT 0821
p... (08) 8985 8840 | e... melinda.hull@pfes.nt.gov.au | www.nt.gov.au/pfes

Working in partnership with the community to ensure a safe and resilient Northern Territory.

Sarah Grady

From: David Rhind <David.Rhind@nt.gov.au> on behalf of eia NTEPA <eia.NTEPA@nt.gov.au>
Sent: Friday, 11 December 2015 3:40 PM
To: B.brosnan@wellard.com.au
Cc: Matthew Barnes; Alana Mackay; Sarah Grady; Simon Lott
Subject: FW: Wellard Development submission

Hi Bernie

We have received the following public comment on the draft EIS for the Integrated Live Export Facility.
Could you please acknowledge receipt of this email?
Kind regards

David

David Rhind | Senior Environmental Assessment Officer
Northern Territory Environment Protection Authority
p: (08) 8924 4047 | f: (08) 8924 4053 |
e: David.Rhind@nt.gov.au | www.ntepa.nt.gov.au

The Avenue, Level 2, Suite 201
12 Salonika Street, Parap NT 0820
GPO Box 3675, Darwin NT 0801



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From: Glenn Speirs [<mailto:glennandzoe@bigpond.com>]
Sent: Wednesday, 9 December 2015 9:07 PM
To: eia NTEPA
Subject: Wellard Development submission

To whom it may concern

I live at 102 Affleck Road Acacia Hills with my Wife, Daughter, her Partner and two Granddaughters. I made the decision to purchase this property two years ago to provide a clean, happy and safe environment for my family, knowing that AACO Abattoirs was being built on the other side of the Stuart Highway approximately 1km away with information that it was to operate using world's best practice. This appears to be far from the truth as we have encountered nothing but gut wrenching smells from this facility since production has commenced.

I am asking the NTEPA to reject the Wellard development due to the location being too close to existing homes and the already foul smelling AACO facility.
These large national companies cannot be trusted with the truth they are only interested in exploiting what they can with no regard for people or consequence for the environment as being the case with AACO.

My concerns are,

1. Our family reside only 1.4km from the proposed holding pens.
2. Major smells from up to 12000 head of cattle defecating and flatulence at any one time.
3. No plan for removal of manure in the wet season /stockpiled manure in the Wet season will emit odours.
4. Health issues from dust and the heightened risk of contracting Q fever as we have AACO, Santavan and now the proposed Wellard development.
5. Increased mosquito infestation from open water storage.
6. Noise and dust pollution from Road Trains will not be the same as a normal rural operation as stated.
7. Traffic hazards from Road Trains using the same access road as the abattoir with a rail crossing.
8. Commercial use of ground water that will impact levels on existing home use bores in the area, my bore is at 80m as are many others.
9. Manure pollution run off in the wet season into the Berry Springs, Hardy Creek and possibly other surrounding catchments.
10. Reduced property values.
11. There will be only one wastewater treatment pond this will not suffice considering the AACO plant should have had at least 3-4 treatment plants as recommended by Worlds best practice.

I request you consider the negative impact this will have on residents in the surrounding area and reject this Wellard development, this is not a rural farm operation as they suggest but a highly concentrated heavy industry based operation.

Kind Regards
Glenn Speirs
PH: 0417 823 154

DEPARTMENT OF LAND RESOURCE MANAGEMENT

Our ref DLRM2015/8881
Your ref

Executive Director, Rangelands
Goyder Centre
25 Chung Wah Terrace, Palmerston
Postal address PO Box 496
PALMERSTON NT 0831
Tel 08 8999 3692
Fax 08 8999 4403
Email james.pratt@nt.gov.au

David Rhind
Environment Protection Authority
GPO Box 3675
Darwin NT 0801

Dear Mr Rhind

RE: Environmental Impact Statement (EIS) for Comment – Wellard Rural Exports Integrated Live Export Facility.

- The EIS identifies the risks to surface water quality adequately. However, the proposed monitoring program of ground and surface water quality, as well as the monitoring of potential shallow groundwater contamination, should be improved.

Runoff from the irrigation area is directed to the 'clean water storage dam'. As stated by the proponent, this runoff could potentially carry pollutants from the application of wastewater to the irrigation area. Water from the clean water storage eventually flows into Hardy's Creek; however, the monitoring program does not include monitoring of stormwater or monitoring of water released from the dam.

Despite being identified as a risk, there is no monitoring of groundwater under the irrigated area, or for stormwater runoff from the irrigated area. Shallow groundwater quality testing is currently restricted to the wastewater pond. It is recommended that shallow ground water testing should be extended to the irrigation area where wastewater is directly applied to the ground and there is a high risk of nutrient leaching. The frequency of testing should also be increased.

To adequately assess the effectiveness of the wastewater systems, and to establish whether the facility has an impact on the ground and surface water quality of the area, a monitoring program based on a BACI (before/after/control/impact) design is required.

As a minimum, the monitoring program should include the following:

- Assessment of baseline (prior to commencement of construction) water quality in Hardy's Creek with at least monthly sampling plus event based sampling.
- Assessment of baseline groundwater quality in the existing bores prior to commencement of construction.
- Assessment of baseline water quality in shallow groundwater under wastewater ponds and irrigation area (possibly installation of additional piezometers under the irrigation area).
- Assessment of baseline stormwater quality (runoff from the site to Hardy's Creek) prior to commencement of construction.
- Ongoing monitoring of surface water (Hardy's Creek and stormwater runoff from 'clean water storage'), shallow and deep groundwater quality during construction and operation of the facility (at least monthly, as currently proposed).

- Ongoing assessment of water quality against baseline measures and water quality objectives for surface waters.
- Inclusion of proposed action if contamination is detected.

The Environmental Management Plan (Appendix E) specifies a procedure for managing non-compliance incidents in regards to monitoring but does not specify what compliance means in relation to surface and groundwater quality. Surface water quality objectives are available for the Darwin region; however, pre-construction groundwater quality needs to be assessed by the proponent.

The conceptualisation in the Hydrological Assessment (Appendix O) is incorrect. The geological formation underlying the site is believed to be White's Formation. The aquifers developed in this formation are within moderate to steeply dipping strata and not connected to Berry Creek in the manner as depicted in Figure 6 of the report.

In regards to groundwater availability, the test bore drilled as part of the hydrological investigation is believed to have intersected White's Formation, in which beds of dolomite are occasionally reported. The dolomite beds may form aquifers; however, the yields will vary - typically ranging from 0.5 L/s up to approximately 5 L/s. While the single bore drilled at the north-east corner of the study site may have yielded 7 L/s during drilling, this result does not imply that this is an extensive resource, or that this pumping rate would be sustainable.

It is also noted that the bore drilled as part of the investigation is not a registered water bore.

The project seeks to extract 250 ML/y which equates to approximately 8 L/s continuous pumping. White's Formation is extensively weathered across the region and recharge would occur through the weathered profile. In calculating potential recharge across the development site, a figure of 200 mm (approximately 10% of rainfall) is applied over an area of 905,100 m². The calculated recharge is 181 ML/y. If 20% of recharge is available for consumptive use, then the sustainable yield is 36.2 ML/y. The required volume of water (250 ML/y) therefore exceeds the sustainable yield.

- The Department considers that the findings of the draft EIS, with respect to low risks to flora and fauna, are sound and consistent with the location of the facility on a property that has been entirely cleared of native vegetation.
- A review of the Erosion and Sediment Control Plan (ESCP), provided in Appendix I, has identified the following:
 - In section 1.2 of the ESCP, the last paragraph on Page 1 states that *'The early works is expected to commence in late 2015 followed by Stages 1 and 2, to have all the works completed by September 2016'*. However, the last paragraph on page 2 states that Stage 2 *'is planned for construction in 2017'*. The timing of works should be clarified.
 - The use of broad-scale soil mapping for site specific work is not considered to be appropriate. More detailed soil information should be used to determine soil erosivity (K).
 - The factors that have been used to calculate the estimated rate of soil loss (using the Revised Universal Soil Loss Equation - RUSLE) appear to be incorrect. It is advised that these factors be revised to ensure the estimated soil loss is calculated correctly, as this will affect the design of controls (e.g. basin sizing, bank spacing, etc.). Incorrect design may result in the failure of erosion and sediment control infrastructure. The proponent is encouraged to contact the Department's Land Management Unit on (08) 8999 4572 for further information.
 - Assuming that the soil texture descriptions listed in Table 1 of the ESCP have been derived from the Unified Soil Classification, soil textures of sandy silt and silty clay

correspond to K factors of 0.02 and 0.033 respectively - both higher than the value of 0.012 which has been used in the ESCP to estimate the rate soil loss (Table 3).

- The information provided in the ESCP is general in nature and is insufficient to enable proper assessment to determine whether the risk of erosion associated with the proposed works will be satisfactorily minimised and be able to be effectively implemented on the ground by contractors. However, it is recognised that this version of the ESCP is to be superseded, as section 3 of the ESCP indicates "A revised ESCP including a diagram with the mapped control measures throughout the construction phases of the project will be provided on finalisation of the detailed design". Therefore it is recommended that the revised plan comprise the following:
 - o A3 Graphical plan for cut and fill
 - o A3 Graphical plan for construction phase
 - o A3 Graphical plan for completed works
 - o A3 page of standard drawings and construction notes.

The proponent is encouraged to refer to the Department's erosion and sediment control fact sheets and technical notes, including Tech Note No. 17 - Graded Banks <http://www.lrm.nt.gov.au/soil/management/technotes> (in preference to DERM 2004 specifications listed in Table 6 of the ESCP).

- The Department recommends that prior to the commencement of works, an Erosion and Sediment Control Plan (ESCP) should be submitted to and approved by the consent authority. The plan should be developed by a suitably qualified and experienced professional in erosion and sediment control planning, and should detail methods and treatments for minimising erosion and sediment loss from the site during the construction phase. The IECA Best Practice Erosion and Sediment Control Guidelines 2008 (or higher) may be referenced as a guide to the type of information, detail and data that should be included in an ESCP. Information regarding erosion and sediment control and ESCP content is available at www.austieca.com.au and the DLRM website: <http://lrm.nt.gov.au/soil/management>.
- The Draft EIS in conjunction with the Weed Management Plan (Appendix G) addresses the concerns of the Department in relation to weed spread to or from the proposed facility and the ongoing management of weeds present on site.

Should you have any further queries regarding these comments, please contact Jason Hill by email jasonv.hill@nt.gov.au or phone (08) 8999 4443.

Yours sincerely



JAMES PRATT

10 December 2015

Sarah Grady

From: Matthew Barnes <Matthew.Barnes@nt.gov.au> on behalf of eia NTEPA <eia.NTEPA@nt.gov.au>
Sent: Thursday, 10 December 2015 5:18 PM
To: 'Bernie Brosnan'
Cc: Alana Mackay; David Rhind; Sarah Grady; Simon Lott
Subject: FW: Reminder: Draft Environmental Impact Statement for Comment - Wellard Rural Exports – Integrated Live Export Facility

Hi Bernie,

Below is the Department of Health – Environmental Health Branch's comments regarding the ILEF EIS. Please acknowledge receipt of this correspondence.

Matthew Barnes | Assessment Officer | Environmental Assessment Unit
Northern Territory Environment Protection Authority
 p: (08) 8924 4050 | f: (08) 8942 6554
 e: matthew.barnes@nt.gov.au | www.ntepa.nt.gov.au

The Avenue, Level 2, Suite 201
 12 Salonika Street, Parap, NT 0820
 GPO Box 3675, Darwin NT 0801



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From: Peter Rogers
Sent: Thursday, 10 December 2015 3:56 PM
To: eia NTEPA
Cc: Xavier Schobben; envirohealth THS; Claire Morton; Sheree Scott; Joshua Heath
Subject: RE: Reminder: Draft Environmental Impact Statement for Comment - Wellard Rural Exports – Integrated Live Export Facility

Attn: David Rhind

Please find below DoH Environmental Health Branch's comments on the Draft EIS for Wellard Rural Exports – Integrated Live Export Facility (ILEF):

1.1 Regulatory context of the proposal

Add 'Public and Environmental Health Act and regulations'

3.8.3 Sedimentation Basin

Provide a definition of wastewater as it is extensively referenced throughout the document. It is recommended that 'wastewater' be added to the glossary.

3.8.4 Primary wastewater pond, wet weather storage dam and freshwater runoff dam

The second paragraph should note that the primary wastewater pond does not store any sewage.

3.9.1 Liquid waste management

This paragraph should note that the primary wastewater pond does not store any sewage.

7.2 Liquid Waste Management

There is no mention about on-site sewage management of wastewater generated by staff facilities and design and installation compliance with the Code of Practice for On-site Wastewater Management .

8. Approvals and licences

It should be noted in a new section entitled 'on-site sewage management' that the ILEF is located within a Building Control area which requires that all on-site sewage management systems shall be design and installed in accordance with the Code of Practice for On-site Wastewater Management and certified in accordance with the provisions of the Building Act and/or Public and Environmental Health Act.

9. Mitigation measures

Mitigation measures should also include an Irrigation Management Plan (IMP) in addition to an Environmental Management Plan (EMP).

Public Health Nuisance Abatement

The proponent shall ensure that the construction and operation of the ILEF does not create a public health nuisance, in particular from dust or other particulate matter. DoH has provisions to deal with public health nuisances under the Public and Environmental Health Act.

Please note that comment on biting insects is the jurisdiction of DoH Medical Entomology.

Regards,

Peter Rogers | Senior Program Development Officer

Environmental Health Branch | Department of Health

2nd Floor, Casuarina Plaza, 258 Trower Rd, CASUARINA NT 0810 | PO Box 40596, CASUARINA NT 0811
p... (08) 892 27476 | f... (08) 892 27334 | www.nt.gov.au/health/envirohealth

Sarah Grady

From: Matthew Barnes <Matthew.Barnes@nt.gov.au> on behalf of eia NTEPA <eia.NTEPA@nt.gov.au>
Sent: Tuesday, 8 December 2015 2:45 PM
To: 'Bernie Brosnan'
Cc: David Rhind; Alana Mackay; Sarah Grady; Simon Lott
Subject: FW: Draft Environmental Impact Statement for Comment - Wellard Rural Exports – Integrated Live Export Facility

Hi Bernie,

Here are the Department of Transport comments regarding the ILEF. Thanks for acknowledging receipt of our correspondence, please continue to do so.

Kind Regards,

Matthew Barnes | Assessment Officer | Environmental Assessment Unit
Northern Territory Environment Protection Authority
p: (08) 8924 4050 | f: (08) 8942 6554
e: matthew.barnes@nt.gov.au | www.ntepa.nt.gov.au

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GPO Box 3675, Darwin NT 0801



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From: Cate Schmidt
Sent: Tuesday, 8 December 2015 1:55 PM
To: Paul Purdon
Cc: Jacquelyn Gill
Subject: RE: Draft Environmental Impact Statement for Comment - Wellard Rural Exports – Integrated Live Export Facility

Hi Paul,

The EIS appears to have most of the Departments concerns identified. Areas of particular concern from the Departments perspective include:

- An appropriate Water and waste water runoff mitigation strategy to reduce any incursion onto the road reserve and Highway
- Traffic Management. This Department has already provided information to the proponent on what information is required to further the development as per the Department of Transports policies and procedures (Letter to proponent from Dept. of Transport Appendix C).

Weeds – The EIS mentions a weed management plan has been developed however did not take into consideration the potential for weed spread outside of the project area as a consequence of the proposed activities. The

Department of Transport would like assurance that the weed management plan is compliant with the Weed Management Act and that the proponents will take all measure to ensure no weed incursion or spread onto the road reserve.

I couldn't find reference to a fire management plan which is a critical consideration in the Darwin Region. The proponent should consider adequate fire breaks within their boundary and ensure measures are taken to protect the neighbouring landowners and road reserve from spread of wildfire.

Please don't hesitate to contact me if you require any further information

Regards

Cate Schmidt | Environmental Advisor | Transport Infrastructure Planning Division
Department of Transport

p... (08) 8924 7024 | f... (08) 8924 7211

e... cate.schmidt@nt.gov.au | www.nt.gov.au/transport

Level 1, Energy House, 18-20 Cavenagh Street, Darwin
GPO Box 2520, Darwin NT 0801

Our ref LUPD2015/0006
Your ref EIS 23919.78471

Lands Planning
Level 1, Arnhemica House
16 Parap Road
Darwin NT 0804

Postal address GPO Box 1680
Darwin NT 0801
Tel 08 8999 8963
Fax 08 8999 7189
Email mark.meldrum@nt.gov.au

Mr David Rhind
Northern Territory Environmental Protection Agency
GPO Box 3675
DARWIN NT 0801

Dear Mr Rhind

Draft EIS – Integrated Live Export Facility – Wellard Rural Exports

The Department of Lands, Planning and the Environment (DLPE) have the following comments in relation to the subject Environmental Impact Statement (EIS) regarding the Wellard Rural Exports facility.

The Department has concerns with the validity of much of the information provided about the characteristics of the locality, the policies intended to guide future development in that locality and suggested utilisation of planning instruments to impose buffers on adjacent land to minimise the potential for odour nuisance.

The Locality

The locality is presented as being characterised by existing agricultural activity, including the meat processing facility and the existing export facility, and largely undeveloped land. The area is in fact characterised by a range of rural rather than agricultural activities including a significant component of rural lifestyle lots used exclusively for residential purposes.

Planning Policies

The discussion of land use and planning controls (at 4.10) suggests that the closest house is 800 metres away from the facility so providing appropriate mitigation of odour and visual impacts. There is also some discussion of aspects of policies and current proposals.

This discussion does not acknowledge that while much of the land around the proposal is currently vacant, the existing zones allow future development of this land for a variety of uses, in many instances without consent.

The recognition of the Darwin Regional Land Use Plan (DRLUP) and the current proposal for urban development in the locality is limited to identification of a possible sewerage treatment facility on the site immediately north of the current proposal and the likely need for a buffer. The significance of the DRLUP and the current proposed amendment to facilitate urban development are far more significant as a constraint to the proposed facility than the limited synergies that may be associated with adjoining buffers.

Planning Instruments

Various sections of the EIS and Appendix C – Odour Assessment, focus on the implementation of controls on the use of adjoining land. The argument is that the existing abattoir and export facility to the south and north of the current proposal constitute an “agri-business” precinct that should be afforded a buffer zone to protect future operations.

The suggestion that the buffers are required for the broader precinct does not acknowledge that:

- the approval of the abattoir was based on the provision of the necessary buffers within the site;
- the site of the existing export facility, which may have status as an existing use, has been identified in the Darwin Regional Land Use Plan 2015 for future urban / peri-urban residential; and
- a proposal to amend the NT Planning Scheme to facilitate urban / peri-urban development has recently been exhibited and is currently being considered by the NT Government.

The arguments also do not recognise that the current proposal represents intensive animal husbandry, a use allowed only with discretion and in accordance with clause 10.1 of the NT Planning Scheme which provides criteria for consideration of such facilities including potential impacts on ground and surface waters and amenity.

As suggested in the documentation, buffers are utilised in other jurisdictions and could theoretically be introduced into the NT Planning Scheme. The difficulty is with the retrospective imposition of such buffers, on land owned by others, to protect a use which is only allowed with discretion within the existing zones. Such an amendment would be extremely unlikely given that such an amendment would be contrary to the DRLUP and would be opposed by the owners of the affected land.

In addition to the suggestion of buffers is a further recommendation (at 7.1.3) that land to the east of the site between the Stuart Highway and the WW2 Hughes Airstrip be left as is and that clearing of native vegetation be prevented to provide an additional buffer for noise, odour and dust. This area is also identified on the DRLUP as urban / peri-urban and subject to the current amendment to facilitate such development.

Other Concerns

Ground and Surface Waters

There appear to be a number of potential impacts on both the quantity and quality of both ground and surface water including liquid and solid waste management, drainage and stormwater and the irrigation of waste.

The management and mitigation measures emphasise the need for consideration of these potential impacts within the context of other existing or potential contributors. Given the significance of the water resources in this locality in terms of both stock and domestic supply to a significant number of residents and commercial horticulture activities and to the iconic Berry Springs and Territory Wildlife Park more definitive consideration of potential impacts and mitigation strategies appears necessary.

Feasible Alternatives

Identification of the feasible alternatives rule out a remote facility on the grounds of the greater costs of holding cattle distant to the harbour and embarkation point but elsewhere the role of the facility is identified as a stopover between farm and ship. Some discussion is needed as to why a longer journey from farm to facility and shorter journey from there to embarkation is more cost effective than a shorter journey from the farm to the facility and a longer journey from the facility to embarkation.

Odour (7.7)

The identified base line conditions are not a legitimate reflection of the existing development in the locality. This section does not differentiate between intensive animal husbandry and agriculture. While there is some ongoing agricultural activity in the locality the predominant land use is rural living and the policy for future development is for more intense residential development. The abattoir is in the immediate locality but was approved only after it was established that the impacts would be limited to the site of the development.

Noise (7.8)

Although sensitive receptors and mitigation measures are identified for the construction period, no consideration has been given to the ongoing impacts of operational noise. Of particular concern is the lack of recognition that 24 hour loading operations may impact on both current and potential future development as identified in the NT Planning Scheme and the Darwin Regional Land Use Plan 2015.

Heritage

The EIS adequately addresses cultural heritage and Aboriginal archaeological issues and incorporates advice previously provided by Department regarding the proposed Integrated Live Export Facility development.

Please contact Del Batton, Lands Planning on telephone (08) 8999 3901 if you require any additional information concerning the matters herein.

Yours sincerely



MARK MELDRUM

Director, Lands Planning

7.12. 2015

Sarah Grady

From: Matthew Barnes <Matthew.Barnes@nt.gov.au> on behalf of eia NTEPA <eia.NTEPA@nt.gov.au>
Sent: Friday, 4 December 2015 3:26 PM
To: 'Bernie Brosnan'
Cc: Sarah Grady; Alana Mackay; David Rhind; Simon Lott
Subject: FW: Reminder: Draft Environmental Impact Statement for Comment - Wellard Rural Exports – Integrated Live Export Facility

Dear Bernie,

The Parks and Wildlife Commission have provided comments for the ILEF (see below). Please acknowledge receipt of this email.

Kind Regards,

Matthew Barnes | Assessment Officer | Environmental Assessment Unit
Northern Territory Environment Protection Authority
p: (08) 8924 4050 | f: (08) 8942 6554
e: matthew.barnes@nt.gov.au | www.ntepa.nt.gov.au

The Avenue, Level 2, Suite 201
12 Salonika Street, Parap, NT 0820
GPO Box 3675, Darwin NT 0801



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From: Anne Walters
Sent: Friday, 4 December 2015 1:53 PM
To: eia NTEPA
Subject: RE: Reminder: Draft Environmental Impact Statement for Comment - Wellard Rural Exports – Integrated Live Export Facility

Hi,

Thank you for the opportunity to comment on the EIS for Wellard Rural Exports – Integrated Live Export Facility.

Having reviewed the documents, the 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.

Please don't hesitate to contact me if you have any queries or questions.

Warm regards,

Anne

Sarah Grady

From: Matthew Barnes <Matthew.Barnes@nt.gov.au> on behalf of eia NTEPA <eia.NTEPA@nt.gov.au>
Sent: Friday, 4 December 2015 11:00 AM
To: 'Bernie Brosnan'
Cc: Sarah Grady; Simon Lott; David Rhind; Alana Mackay
Subject: FW: DoI response to Draft Environmental Impact Statement for Comment - Wellard Rural Exports - Integrated Live Export Facility

Dear Bernie,

The Department of Infrastructure have provided comments for the ILEF (see below).
 I will keep forwarding these comments as they arrive.

Kind Regards,

Matthew Barnes | Assessment Officer | Environmental Assessment Unit
Northern Territory Environment Protection Authority
 p: (08) 8924 4050 | f: (08) 8942 6554
 e: matthew.barnes@nt.gov.au | www.ntepa.nt.gov.au

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From: Daryl Browne
Sent: Friday, 4 December 2015 9:31 AM
To: eia NTEPA; David Rhind
Cc: Craig Smith
Subject: DoI response to Draft Environmental Impact Statement for Comment - Wellard Rural Exports - Integrated Live Export Facility

David

The Department of Infrastructure (DoI), Engineering and Environment Services on behalf of the Department have reviewed the Draft Environmental Impact Statement (Draft EIS) for the Wellard Rural Exports – Integrated Live Export Facility and provide the following on the proposed development.

DoI manage the maintenance of roads which will be used to enter and exit the proposed site – Section 5544, Hundred of Strangways, Livingston. Section 3.2 states: *The access road will be a heavy vehicle access road that utilises the existing AA Co. Meat Processing Facility heavy vehicle access road from the Stuart Highway.* The Draft EIS estimates at peak time of transport for overseas shipping, a spread of 133 outbound vehicles (Triple road trains) over a period of up to 24 hours. These trucks will be transporting between the facility and the Darwin Port at East Arm.

A number of recommendations are supplied within Appendix Q of the Draft EIS for the intersection associated with the entrance/exit point onto the Stuart Highway. Of these, the addition of a northbound acceleration lane has been put forward.

DoI would support any upgrades to the intersection and surrounding road infrastructure if it contributes to the improved safety of all road users.

It is anticipated the Department of Transport as the Asset owner of the Stuart Highway and roads required for transport to the port will provide a detailed response in relation to impacts on road assets as a result of the proposed development.

Regards

Daryl Browne | Senior Project Manager | Engineering and Environment Services
Department of Infrastructure
p. 08 8999 4440 | m. 0417 749 364 | f. 8999 4633
e. daryl.browne@nt.gov.au | <http://www.nt.gov.au>
Level 3, Highway House, Palmerston Circuit, Palmerston
PO Box 61, Palmerston NT 0831

Check on upcoming road works through Facebook: <http://www.facebook.com/roadreportnt>

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Dr. Anne Walters
Strategic Advisor to the Chief Executive Officer
The Parks and Wildlife Commission of the Northern Territory
Northern Territory Government
PO Box 496, PALMERSTON NT 0831
Ph. 08 8999 4456
Mob. 0429 097 057

Email. anne.walters@nt.gov.au

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DEPARTMENT OF BUSINESS

www.nt.gov.au

Economics and Policy
Level 5, Charles Darwin Centre
19 The Mall
Darwin NT 0800

Postal address GPO Box 3200
Darwin NT 0801
Tel 08 8999 7939
Fax 08 8999 7022

Mr David Rhind
Environmental Assessment
Environmental Protection Agency
GPO Box 3675
Darwin NT 0801

Dear Mr Rhind

**Re: Draft EIS for Comment – Wellard Rural Exports Pty Ltd – Integrated
Live Export Facility**

Thank you for your email dated 30 October 2015 and the opportunity to review the EIS for *Wellard Rural Exports Pty Ltd – Integrated Live Export Facility*.

The Department of Business (DOB) does not have any major issues in relation to the Draft EIS.

DOB notes that this project would provide socio-economic benefits to the region as well as the broader Territory economy. The economic benefits of live cattle export trade to the Territory economy, although not fully elaborated in the report, are well understood.

The agency contact officer for this matter, Mr Shiw Murti, Principal Economist, can be contacted on 8999 5139.

Yours sincerely

Joseph Kuhn
Deputy Director, Strategic Policy & Research

3 December 2015

Sarah Grady

From: Matthew Barnes <Matthew.Barnes@nt.gov.au> on behalf of eia NTEPA <eia.NTEPA@nt.gov.au>
Sent: Thursday, 3 December 2015 3:49 PM
To: 'Bernie Brosnan'
Cc: Simon Lott; Sarah Grady; Alana Mackay; David Rhind
Subject: RE: Power and Water Comment - Wellard Rural Exports – Integrated Live Export Facility

Hi Bernie,

The Power and Water Corporation responded to the notice that the draft Environmental Impact Statement for the Integrated Live Export Facility is available for public exhibition but did not provide technical comments. For your records, the following email was received:

Hi David,

No comments from PWC for the below project.

Kind regards,

Sarah Gilley

*Environmental Officer
Environmental Services
Power and Water Corporation
Ben Hammond Centre, Darwin
GPO Box 37471, Winnellie NT 0821
Tel: 08 8995 5825
Email: sarah.gilley@powerwater.com.au
Web: www.powerwater.com.au*

Kind Regards,

Matthew Barnes | Assessment Officer | Environmental Assessment Unit
Northern Territory Environment Protection Authority
p: (08) 8924 4050 | f: (08) 8924 4053
e: matthew.barnes@nt.gov.au | www.ntepa.nt.gov.au

The Avenue, Level 2, Suite 201
12 Salonika Street, Parap, NT 0820
GPO Box 3675, Darwin NT 0801

ntepa Northern Territory
Environment Protection Authority



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From: Bernie Brosnan [mailto:B.Brosnan@wellard.com.au]
Sent: Thursday, 3 December 2015 2:52 PM
To: eia NTEPA
Cc: 'Simon.lott@enviroag.net.au'; 'Sarah Grady'; Alana Mackay; David Rhind
Subject: RE: Draft Environmental Impact Statement for Comment - Wellard Rural Exports – Integrated Live Export Facility

Hi Matthew,

Thank you for your email and I acknowledge receipt of the comment made by Tourism NT,

Regards,

Bernie Brosnan

General Manager South East Asia

South East Asia Division | Wellard Rural Exports Pty Ltd | 2500 Stuart Highway | Livingstone, NT, 0837
T +61 419 866 268 | F +61 8 9819 958 | M +61 419 866 268 | E B.Brosnan@wellard.com.au



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From: Matthew Barnes [mailto:Matthew.Barnes@nt.gov.au] **On Behalf Of** eia NTEPA
Sent: Thursday, 3 December 2015 2:27 PM
To: Bernie Brosnan
Cc: 'Simon.lott@enviroag.net.au'; 'Sarah Grady'; Alana Mackay; David Rhind
Subject: FW: Draft Environmental Impact Statement for Comment - Wellard Rural Exports – Integrated Live Export Facility

Dear Bernie,

We have received a comment from Tourism NT (below) regarding the proposed Integrated Live Export Facility.
Please acknowledge receipt of this email.

Kind Regards,

Matthew Barnes | Assessment Officer | Environmental Assessment Unit
Northern Territory Environment Protection Authority
p: (08) 8924 4050 | f: (08) 8924 4053
e: matthew.barnes@nt.gov.au | www.ntepa.nt.gov.au

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From: Valerie Smith

Sent: Thursday, 3 December 2015 2:17 PM

To: eia NTEPA

Subject: RE: Draft Environmental Impact Statement for Comment - Wellard Rural Exports – Integrated Live Export Facility

Potential tourism impacts are mostly from the increase in traffic.

The facility will adjoin similar neighbouring developments, and is separated by appropriate distance and buffers from the nearby tourist area of Berry Springs, which is eight kilometres west. Tourist will travel past the location and vegetation and tree lines alongside the Stuart Highway will be important to act as a buffer for visual amenity, noise, dust and odour. Impacts on tourists travelling past are likely to be low if the buffer is adequate.

The increased volume of vehicles (particularly road trains) has the potential to create an increased risk of road accident and/or have implications for travellers and residents alike. There is an overarching Environmental Management Plan and a smaller sub plan for traffic management with minimal detail. Tourism NT recommends the mitigation, management and monitoring procedures within the EIS under section 7.16.3 be adhered to.

Valerie Smith

Director Planning and Policy

Tourism NT

Level 8, Charles Darwin Centre

19 the Mall, Darwin NT Australia

T +61 8 8999 3939 M +61 0 401 115 670

valerie.smith@nt.gov.au travelnt.com tourismnt.com

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Sarah Grady

From: Matthew Barnes <Matthew.Barnes@nt.gov.au> on behalf of eia NTEPA <eia.NTEPA@nt.gov.au>
Sent: Thursday, 3 December 2015 2:57 PM
To: 'Bernie Brosnan'
Cc: Simon Lott; Sarah Grady; Alana Mackay; David Rhind
Subject: FW: Draft Environmental Impact Statement for Comment - Wellard Rural Exports – Integrated Live Export Facility

Dear Bernie,

We have received a comment from Tourism NT (below) regarding the proposed Integrated Live Export Facility. Please acknowledge receipt of this email.

Kind Regards,

Matthew Barnes | Assessment Officer | Environmental Assessment Unit
Northern Territory Environment Protection Authority
p: (08) 8924 4050 | f: (08) 8924 4053
e: matthew.barnes@nt.gov.au | www.ntepa.nt.gov.au

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From: Valerie Smith
Sent: Thursday, 3 December 2015 2:17 PM
To: eia NTEPA
Subject: RE: Draft Environmental Impact Statement for Comment - Wellard Rural Exports – Integrated Live Export Facility

Potential tourism impacts are mostly from the increase in traffic.

The facility will adjoin similar neighbouring developments, and is separated by appropriate distance and buffers from the nearby tourist area of Berry Springs, which is eight kilometres west. Tourist will travel past the location and vegetation and tree lines alongside the Stuart Highway will be important to act as a buffer for visual amenity, noise, dust and odour. Impacts on tourists travelling past are likely to be low if the buffer is adequate.

The increased volume of vehicles (particularly road trains) has the potential to create an increased risk of road accident and/or have implications for travellers and residents alike. There is an overarching Environmental Management Plan and a smaller sub plan for traffic management with minimal detail. Tourism NT recommends the mitigation, management and monitoring procedures within the EIS under section 7.16.3 be adhered to.

Valerie Smith
Director Planning and Policy

Tourism NT

Level 8, Charles Darwin Centre
19 the Mall, Darwin NT Australia

T +61 8 8999 3939 M +61 0 401 115 670

valerie.smith@nt.gov.au travelnt.com tourismnt.com

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