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GLEN INNES SEVERN COUNCIL

DA 25/20-21 JARDANA PTY. LTD.

AN ANIMAL LIBERATION SUBMISSION



We acknowledge the
Traditional Owners of
country throughout
Australia and recognise
their continuing
connection to land, waters
and culture.

We acknowledge that this
document was written on
land stolen from and
never ceded by the
Gadigal People.

We pay our respects to
their Elders past, present
and emerging.





We don't have a duty to **speak** for the animals;
we have an obligation to be **heard** for the animals.

Matt Ball (2006)

DOCUMENT DETAILS

Animal Liberation 2020. DA 25/20-21. A submission by Animal Liberation in response to the Development Application No. 25/20-21 by Jardana Pty. Ltd. with the Glen Innes Severn Council for a 1,000 head, intensive cattle feedlot. Prepared by Lisa Ryan.

ABOUT ANIMAL LIBERATION

Animal Liberation has worked to permanently improve the lives of all animals for over four decades. We are proud to be Australia's longest serving animal rights organisation. During this time, we have accumulated considerable experience and knowledge relating to issues of animal welfare and animal protection in this country. We have witnessed the growing popular sentiment towards the welfare of animals, combined with a diminishing level of public confidence in current attempts, legislative or otherwise, to protect animals from egregious, undue, or unnecessary harm. Our mission is to permanently improve the lives of all animals through education, action, and outreach.

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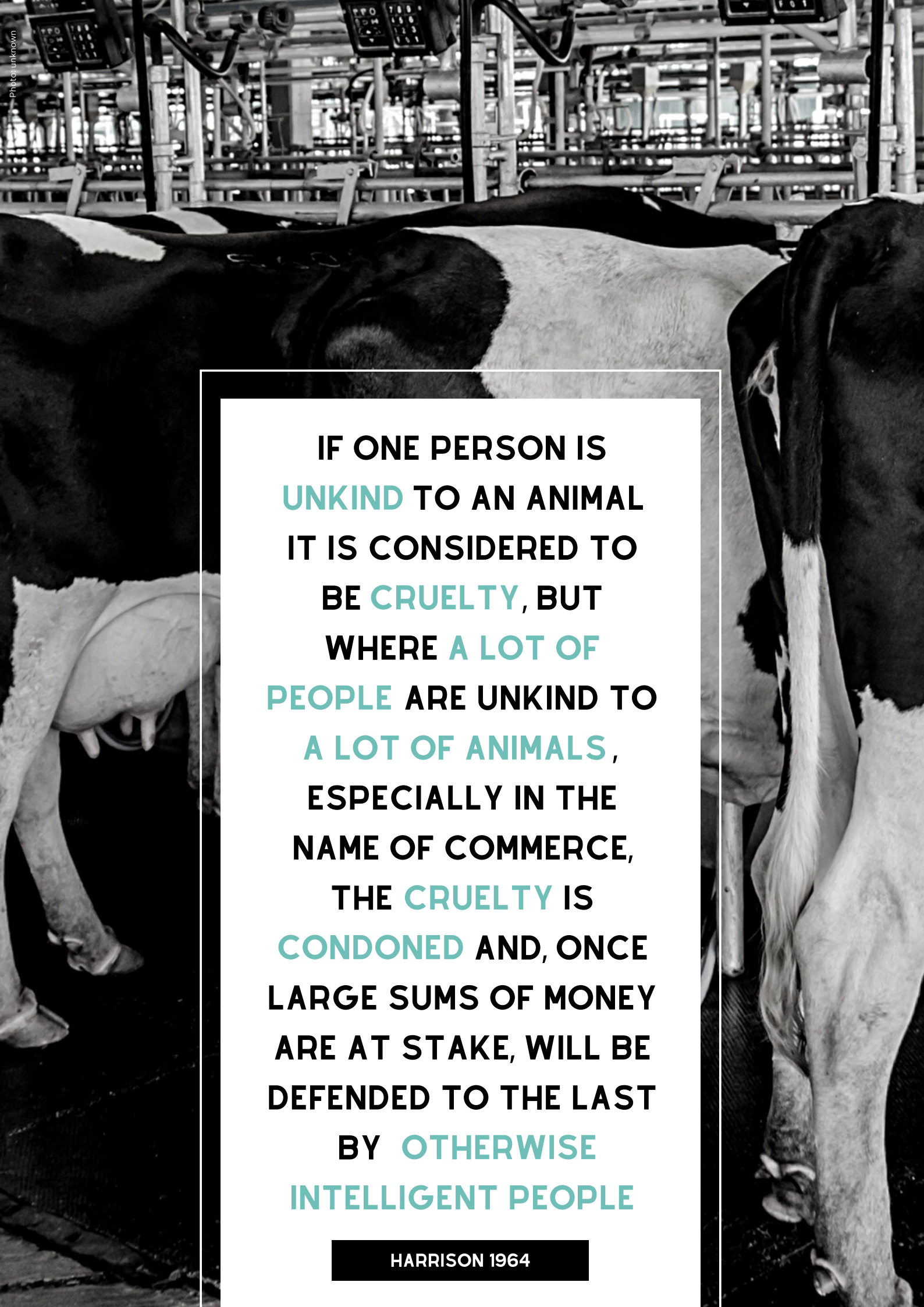
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IF ONE PERSON IS
UNKIND TO AN ANIMAL
IT IS CONSIDERED TO
BE **CRUELTY**, BUT
WHERE **A LOT OF**
PEOPLE ARE UNKIND TO
A LOT OF ANIMALS,
ESPECIALLY IN THE
NAME OF COMMERCE,
THE **CRUELTY** IS
CONDONED AND, ONCE
LARGE SUMS OF MONEY
ARE AT STAKE, WILL BE
DEFENDED TO THE LAST
BY **OTHERWISE**
INTELLIGENT PEOPLE

HARRISON 1964

26 November 2020

GLEN INNES SEVERN COUNCIL
council@gisc.nsw.gov.au



We present this submission on behalf of Animal Liberation.

Animal Liberation is grateful to Glen Innes Severn Council for the opportunity to lodge a submission in response to the Jardana Pty Ltd Development Application (DA), for a proposed intensive cattle feedlot at Stonehenge, in the Glen Innes Severn Local Government Area (LGA).

We request that it be noted from the outset that the following submission is not intended to provide an exhaustive commentary or assessment in response to the issues contained within the scope of the DA, and/or, the corresponding Statement of Environmental Effects (SoEE). Rather, our submission is intended to provide a general examination and responses to select areas of key concern. As such, the absence of discussion, consideration or analyses of any particular aspect or component must not be read as or considered to be indicative of consent or acceptance.

For the purposes of this submission, Animal Liberation's focus covers aspects that we believe warrant critical attention and response. Particularly, the absence or the inadequacy of provisions for initiating and/or planning sustainability programs and policies; a distinct lack of concerted effort to transparently consider and support viable alternatives to unsustainable practices; and, finally, the lack of institutional resistance to sound science, emerging public opinion and the increasingly urgent need to proactively phase out environmentally harmful products and practices which also result in serious risks and impacts to humans and non-human animals. To this end, our primary focus is on the inherently unsustainable and harmful nature and consequences of intensive cattle feedlots.

Lisa J. Ryan
Regional campaign co-ordinator

Alex Vince
Campaign director

DISCLOSURE

In line with section 147(4) of the Environmental Planning and Assessment Act 1979, Animal Liberation confirms its understanding and acceptance that any submissions made in respect of the proposed development are available for public inspection under the provisions of the Government Information (Public Access) Act 2009 (GIPA Request).

In line with Amendments to Local Government and Planning Legislation requiring the public disclosure of donations or gifts when lodging or commenting on development proposals, Animal Liberation discloses and confirms that it has not made any political donations and/or of gifts in the 2 years preceding the application.

SUBJECT: OBJECTION – DEVELOPMENT APPLICATION NO. 25/20–21, JARDANA P/L.

Animal Liberation is grateful to Glen Innes Severn Council for the opportunity to lodge a submission in response to the Jardana Pty Ltd Development Application ('DA'), for a proposed intensive cattle feedlot at Stonehenge, in the Glen Innes Severn Local Government Area ('LGA').

We request that it be noted from the outset that the following submission is not intended to provide an exhaustive commentary or assessment in response to the issues contained within the scope of the DA, and/or, the corresponding Statement of Environmental Effects ('SoEE'). Rather, our submission is intended to provide a general examination and responses to select areas of key concern.

As such, the absence of discussion, consideration or analyses of any particular aspect or component must not be read as or considered to be indicative of consent or acceptance.

For the purposes of this submission, Animal Liberation's focus covers aspects that we believe warrant critical attention and response. Particularly, the absence or the inadequacy of provisions for initiating and/or planning sustainability programs and policies; a distinct lack of concerted effort to transparently consider and support viable alternatives to unsustainable practices; and, finally, acquiescence to institutional resistance despite sound science, emerging public opinion and the increasingly urgent need to proactively phase out environmentally harmful products and practices which also result in serious risks and impacts to humans and non-human animals. To this end, our primary focus is on the inherently unsustainable and harmful nature and consequences of intensive cattle feedlots.

We appreciate council's assessing staff and decision-makers have an onerous responsibility with this complex and technically challenging planning proposal, and that the assessment review must remain independent, objective and informed during the entire process. We

acknowledge and further appreciate that this planning proposal includes risks and impacts which extend beyond the Glen Innes Severn LGA, and accordingly, carries an added and heavy burden of responsibility.

Glen Innes Severn Council as the primary consent authority is required to thoroughly assess the adequacy of information provided and the measures proposed by the Applicant, to mitigate any potential risks, adverse impacts (including cumulative impacts). This is clearly outlined in the Environmental Planning and Assessment Act 1979 which requires Council to give due consideration to social impacts and public interest relating to any proposed development. All these considerations are accordingly a necessary and integral part of any comprehensive, objective and meaningful development assessment in line with the applicable planning instruments.

We have reviewed the SoEE, prepared by the Applicant's consultant, Agricultural Development Services Australia Pty Ltd ('AgDSA'), and the relevant planning framework and instruments at Council, State and Commonwealth Government levels. Animal Liberation is familiar with the history of this proposed development and the previous two applications lodged by the Applicant, including the resulting Land and Environment Court action instigated by the Protect Glen Innes Inc Association against the Applicant and Glen Innes Severn Council. We further note the ongoing strong local community opposition and numerous valid concerns raised by members of the local community.

Animal Liberation has no 'economic' or 'vested interest' pertinent to this planning proposal, however, we care deeply about Animals, our shared Environment, and People including our 'Humanity' which extends to our unique rural communities. We also support the democratic process of public exhibition and the right to have an opinion and voice that opinion, and we support and encourage a rigorous and robust Council assessment process. Our primary objections to the proposed intensive cattle feedlot are set out below.

Finally, it is Animal Liberation's strong recommendation that in consideration of the highly complex and technical nature of this DA and SoEE Council has a duty and a responsibility to engage and

establish an Independent Hearing and Assessment Panel ('IHAP') to ensure key and critical areas which require specialist technical oversight, are adequately assessed by qualified experts in their given fields of knowledge and experience.

EXECUTIVE SUMMARY

1 Animal Liberation is strongly opposed to the DA lodged by Jardana Pty Ltd Development Application (DA), for a proposed intensive cattle feedlot at Stonehenge, in the Glen Innes Severn LGA. Our objection is based on the important and inter-connecting platform of Animals, our shared Environment and People, and can be summarised as follows.

2 The Applicant's completed and signed Development Application form includes potentially inaccurate and potentially misleading information under the heading of 'Statement of Environmental Effects Standard Form'; notably under questions, 1a and 1b, 2c, 4a and 4b, 5b, 5c, 5f, and 5g.

3 The Applicant has failed to identify, respond to and address all risks and impacts and cumulative risks and impacts, and has failed to adequately demonstrate how they would monitor, avoid, minimise, mitigate and manage these risks and impacts.

4 The Applicant has relied on numerous assumptions and statements indicating they have various levels of "confidence" with many of their non-evidenced control measures, and where many other potential risks and impacts are missing entirely. Such omissions prevent decision makers from undertaking a comprehensive, objective and meaningful development assessment, in line with the applicable planning instruments and community expectations. Such omissions can impede sound and effective assessment and decision making can become problematic and flawed, and can potentially lead to serious, adverse, ongoing, permanent and irreversible consequences.

5 The Applicant has failed to undertake the necessary and expected level of consultation with key stakeholders including the local Indigenous Ngorabul people, immediate neighbours, sensitive receptors, and the broad community.

6 The Glen Innes Council's Local Environment Plan (LEP) has not been updated to accurately reflect the current situation. These failures by council include a failure to implement the urgently needed and important protection for the local drinking water catchment, and the noted zoning issues and anomalies of residential properties situated near the proposed feedlot which all lay within the RU1- Primary Production zone.

7

Site selection is critical and it is our view that the proposed cattle feedlot site is entirely unsuitable for any intensive animal agriculture including the proposed intensive cattle feedlot; notably taking into consideration the local topography, local weather patterns, sensitive receptors, and the serious risk of an immediate pollution event or ongoing contamination of local surface water, groundwater and soils.

8

The Applicant refers to offsite effluent management (removal to off-site locations) but has gone outside of the scope of the lodged DA which only applies to onsite effluent management and has failed to elaborate or indeed provide any information at all regarding requirements concerning removal of effluent to off-site locations. The information provided by the Applicant regarding the storage, containment and spreading of effluent is completely inadequate.

9

In general, the information provided by the Applicant regarding manure management and the corresponding sedimentation basin and effluent holding pond, stormwater management, land capacity and cattle mortalities is woefully inadequate for the purposes of a comprehensive and informed planning assessment. These omissions are glaring and ignore the related risks and impacts with odour, amenity, disease and biosecurity, as well as the difficulty in assessing whether or not the provisions for dead cattle are adequate.

10

There has been a marked shift in public expectations about how we treat non-human animals including those raised for human consumption and by-products. The broad public are strongly opposed to intensive and industrial animal agriculture on animal welfare, environmental and public health grounds. Public interest is strong and Council is required to consider contemporary public views and expectations.

11

If approved, the proposed development will result in numerous adverse impacts and will pose significant risks to the local environment, biodiversity and ecosystems. The 'precautionary principle' must be applied in environmental planning decision-making with the conservation of biological diversity and ecological integrity being a fundamental consideration. The 'precautionary principle' requires decision-making to give the environment the benefit of the doubt.

12

The proposed development is not aligned to ecologically sustainable development (ESD) and the conservation of biological diversity and ecological integrity processes which forms part of environmental law and inter generation equality. Council, as the consent authority is required to conserve and enhance the community's resources so that ecological processes on which life depends, are maintained, and that the present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations.

13

The proposed development is not aligned to protecting and preserving native habitat where a fundamental consideration should require all planning and decision making to include an Environmental and Species Impact Statement. In addition to a local community drinking catchment, Beardy Waters is a Natural Habitat to the Rakali - Water Rat, Bell's Turtle and Murray Cod, which are all endangered species.

14

The intensive cattle feedlot development if approved, would result in a highly offensive, unpopular and very visible development, notably with sensitive receptors, and will seriously risk and impact immediate neighbours and their ability to enjoy rural living and peaceful amenity including valid concerns about health and general well-being and issues concerning water, air, noise, visual, odour, dust, vibration, disease and biosecurity.

15

The development will also likely result in negative social and economic impacts to immediate neighbours and the broader community including the depreciation of land value and residential property values. Apart from facilitating a private business, the proposed development offers no benefits to the local community. The Applicant has failed to demonstrate how the proposed development is in the public interest.

WHAT HAPPENS TO THEM MATTERS TO THEM

REGAN 1983



1. INTRODUCTION AND PREFACE

Based on an abundance of credible scientific evidence relating to climate change including current and emerging climate and general weather patterns, we are concerned that much of the available and current SoEE information and data, including numerous 'assumptions', has not fully considered climate change and the 'un-predictability' of our environment.

- 1.1 Over recent times, Australia has experienced extreme, indeed catastrophic weather events, and incidents including severe drought, bushfires and flood. We can no longer assume that any historical data or mapping, and/or lack of mapping, can adequately predict the environmental future with any reliability or certainty. A comprehensive and thorough planning assessment must consider and apply fact and evidence, not assumptions and generalisations.
- 1.2 There is a noted lack of available or up to date mapping and studies pertaining to environmental, biodiversity and heritage considerations pertinent to the Glen Innes and surrounding areas. When large-scale proposals such as the proposed feedlot and the corresponding SoEE are directly related to critical environmental considerations, we can no longer assume anything. We must apply a new and rigorous assessment approach. We can no longer be confident that 'average' rainfall and climate patterns will continue to be the norm, and neither can we assume any parcel of land which has not previously been mapped as being in a flood zone, will not be subject to flooding, and particularly so when the surrounding region has experienced flooding. Nor can we assume that surface water and groundwater supplies are a never-ending supply of useable water.
- 1.3 Globally, across Australia and throughout NSW, we have reached a major cross roads because of the animal agricultural revolution, climate change, human-animal relations, and a massive growth in public awareness and public interest. There has been a major shift in the public's expectations. This has been magnified over recent decades during which time 'traditional' animal agriculture has given way to industrial scale intensive animal agriculture, which is by its very nature, based on a model of high volume and fast production and processing to maximise yields and profits for the agri-business producers, not the communities in which they are situated.
- 1.4 We are facing a climate change, environmental, human health and animal rights emergency, and increasingly, citizens from all walks of life and of all ages are deeply concerned, voicing these concerns and taking action. This was well evidenced by recent Australia wide, peaceful public gatherings of our young people and indeed many other people, calling for greater climate change action in Australia

- 1.4 by our legislators and decision-makers. Decision-makers critically also include all our local government councils who must consider current public perceptions and expectations.
- 1.5 Over the last several decades, animal agriculture in Australia has increasingly become industrialised and secretive. Large scale, intensive animal agriculture is becoming commonplace across our rural landscapes. This is changing and negatively impacting our 'country' landscapes permanently. We are increasingly sacrificing for economic gain, and losing all that is unique, beautiful, precious, and so intrinsically woven into the Australian fabric of who we are as a society. Over the past 50 years, agri-business corporations have replaced family farms. This concentration means that individual profit-driven corporations can be responsible for many thousands of animals at any one time, whilst also securing economic and market dominance. These large, often wealthy and powerful individual profit-driven corporations benefit much at the expense of Animals, the Environment and People, including our rural communities.
- 1.6 In Australia, intensive and industrial-scale animal agriculture is several decades behind similar ventures in the US and Europe however, the destructive path we are following is similar. We need to learn from the mistakes made by others and heed the now evidenced and obvious lessons, impacts and consequences which are increasingly evident around the world, and particularly so in the US.
- 1.7 Communities and everyday people including farmers, are increasingly uniting, mobilising and opposing intensive agri-business – the intensive animal agriculture ventures which are also known as Factory Farms and Concentrated Animal Feeding Operations, or CAFOs. The Right to Harm documentary explores and questions 'whether the economic rights of the agribusiness corporations is more important and takes priority over the basic human rights of people'.
- 1.8 Glen Innes Severn Council will fully appreciate how important animal welfare is to the Australian public and how increasingly the public are far more informed on this topic. A 2018 public survey and report commissioned by the Commonwealth Government's Department of Agriculture and Water Resources, and published by Futureye, Australia's Shifting Mindset on Farm Animal Welfare, gleaned that the latest official figures on animal welfare issues are unequivocal. The report confirmed that 95% of respondents considered animal welfare to be an area of concern, with at least 91% wanting to see this improved through reforms, and many respondents flagged a lack of trust with regulators and perceived 'conflicts of interest'.
- 1.9 Animal Liberation agrees with the premise that "what makes the existence of domesticated farm animals particularly cruel is not just the way in which they die, but above all how they live". The scientific

- 1.9 study of animals has played a dismal role in this unfolding tragedy. The scientific community has used its growing knowledge of animals mainly to manipulate their lives more efficiently in the service of human industry. Yet this same knowledge has demonstrated beyond reasonable doubt that farm animals are sentient beings, with intricate social relations and sophisticated psychological patterns. They may not be as intelligent as us, but they certainly know pain, fear and loneliness. They too can suffer, and they too can feel joy.
- 1.10 According to credible evidenced scientific research, farmed animals are sentient, emotionally complex, intelligent and have rich experiences of the world. They suffer from pain, feel emotions and build strong relationships. And yet on intensive factory farms, animals experience numerous and ongoing impacts on their welfare, including confinement in unnatural and often unsanitary conditions in such large numbers that they struggle to find space to move or reach their food, water or shelter. Routine husbandry procedures include mutilation of sensitive areas without pain relief.
- 1.11 The sentient capacities of non-human animals must be considered by decision-makers when making ethical decisions about the treatment of animals. In 2012, an international group of eminent neuroscientists signed the Cambridge Declaration on Consciousness, which confirmed that many animals, including all mammals and birds, possess the “neurological substrates that generate consciousness. If we accept animal sentience, then practices like factory farming must be reconsidered – based on science and evidence and public expectations. Currently, the law defines the acceptable treatment of animals according to their use rather than their capacity to suffer.
- 1.11.1 Many practices which would qualify as 'cruelty' under the law if performed on a dog are instead 'legal' if done to a cow raised for human consumption and byproducts. Each state and territory has animal cruelty legislation in place, however, significant exemptions exist for the treatment of farmed animals. For example, in NSW it is an offence to fail to provide an animal with adequate exercise except if that animal is a farm animal such as a cow in a feedlot.
- 1.11.2 This is no longer considered acceptable by the mainstream public. As a compassionate and aware society, we must consider that as history has demonstrated over and over again, simply because something is legal, doesn't make it moral, ethical or right. Humanity dictates we all have a moral obligation to challenge injustice and societal wrongs and shape who we are as a society. Our leaders and decision-makers, including local government councils, have a clear responsibility to listen, question and act in this regard. Science and technological advancement has deciphered the secrets of cows and how humans can subject animals to extreme living conditions. Vaccinations,



"ACROSS THE MIDWEST, THE RISE OF FACTORY FARMING IS DESTROYING RURAL COMMUNITIES. AND THE MASSIVE CORPORATIONS BEHIND THE DEVASTATION ARE NOW EYEING A POST-BREXIT UK MARKET [leading to] A VAST TRANSFER OF WEALTH AS FARM PROFITS FUNNELLED INTO CORPORATIONS OR THE DIMINISHING NUMBER OF FAMILIES THAT OWN AN INCREASING SHARE OF THE LAND. RURAL COMMUNITIES HAVE BEEN HOLLOWED OUT"

"CORPORATE AGRICULTURE EVOLVED TO TAKE CONTROL OF THE ENTIRE PRODUCTION LINE FROM 'FARM TO FORK', FROM THE GENETICS OF BREEDING TO WHOLESALERS IN THE US OR FAR EAST. AS FACTORY FARMS SPREAD, THEIR DEMANDS DICTATED THE WORKINGS OF THE SLAUGHTERHOUSES. THE SYSTEM HAS BEEN SET UP FOR THE BENEFIT OF THE FACTORY FARM CORPORATIONS AND THEIR SHAREHOLDERS AT THE EXPENSE OF FAMILY FARMERS, THE REAL PEOPLE, OUR ENVIRONMENT, OUR FOOD SYSTEM..."

Source: How America's food giants swallowed the family farms, the Guardian (2019)



1.11.2 medications, hormones, pesticides, housing systems, husbandry procedures and automatic feeders, now make it possible to cram thousands of cattle into intensive feedlots produce meat and by-products with unprecedented efficiency and profit.

1.11.3 The fate of animals in such industrial installations has become one of the most pressing ethical issues of our time, certainly in terms of the numbers involved. These days, most big animals live on industrial farms. The individual cows are commodities in a factory environment with a focus on profit, not animal welfare, well-being or sentience. Animal welfare as expected, indeed demanded by the community and public, includes animals being entitled to rights, welfare and protection under the internationally recognised 'Five Freedoms'. This includes both physical and mental state, and good animal welfare implies both fitness and a sense of well-being.

1.12 Feedlots include cramped, fenced areas where cattle are grain-fed until they are ready for slaughter. During this time, they are unable to exercise and can be frequently found knee-deep in excrement. Often there's no shelter, as shade is not mandated by regulations. Living in these cramped, filthy conditions subjects the cattle to stress and sickness, with common conditions including footrot, botulism, respiratory disease and liver abscesses.

1.12.1 Intensive animal production systems are cesspits of abnormal stress for animals, with excessive over crowded populations and stock densities and an accumulation of feces and urine, which is a fundamental part of the intensive livestock industry. These intensive environments have been the Petri dishes or the cesspools where diseases, such as swine flu, bird flu and others, have occurred. Those diseases have occurred because they have been facilitated by the industry itself.

1.13 Food production often has a significantly negative impact on our environment, and the production of meat, dairy and, to a lesser extent, eggs has a particularly disproportionate effect on our climate and natural resources. Livestock production has been found to significantly contribute to greenhouse gas emissions. The UN Food and Agriculture Organisation estimates that livestock production is responsible for 18% of greenhouse gas emissions, while other studies put the figure closer to 51%. Either way, livestock production contributes a bigger share of greenhouse gas emissions than the entire global transport sector.

1.13.1 The most significant source of these greenhouse gas emissions is from animal digestion produced methane. In Australia, this creates about three million tonnes of methane annually. By 2022, this methane will have a

1.13.1 greater effect on global warming than emissions from all of Australia's coal-fired power stations combined. Animal agriculture also has a devastating impact on our environment because of the huge consumption of water and resources. The average 'water footprint' per calorie of protein from meat is significant. To produce 1kg of meat protein, an average of 6kg of plant protein is required. Around 30% of the total land surface of the planet is now used for livestock production, with animal products now identified as a key driver of deforestation, with previously forested land often now occupied by pastures and feed crops for livestock.

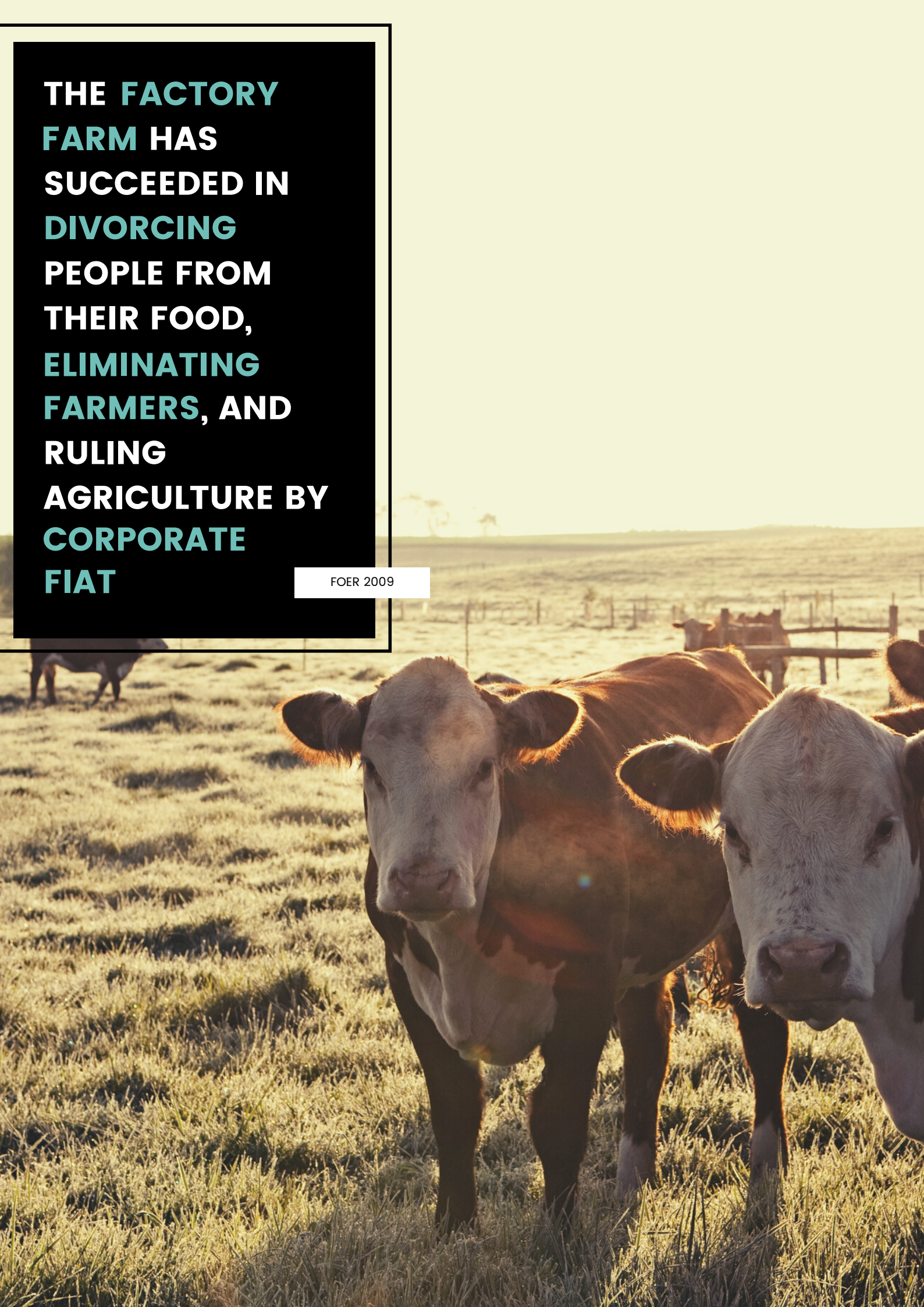
1.14 Globally, the world has been crippled with the Covid-19 pandemic which many eminent scientists believe originated from "wet markets", and yet much of the intense focus has ignored the very breeding grounds for the diseases originating in global, industrial food systems. Much of the focus has also ignored the large-scale destruction of habitats that are forcing animals out of their natural environments and into closer proximity with people and other animals. This is not the first animal-human pandemic and it will not be the last. The world has a long history of deadly pandemics that are, like Covid-19, deeply rooted in our treatment of animals and notably, the estimated 70 billion who are raised and killed for food each year around the world. Experts in these areas have continued to warn us that industrial animal farming has caused most new infectious diseases in humans in the past decade – and risks starting new pandemics as animal markets have done. Over the past few decades, there have been several viruses and pathogenic bacteria that have switched species from wild animals to humans.

1.15 Intensive animal factory farming often involves the use of large amounts of antibiotics. This can and does result in the development of antibiotic-resistant strains of diseases (also known as "superbugs"), which can be transferred to humans. In spite of increasing concerns being raised, the government, even with its current focus on biosecurity, has failed to investigate and satisfy public health authorities that there will not be any further cases of antibiotic resistance in the general public. This leaves people and particularly workers in intensive animal factory farms at serious risk. Researchers led by the University of Sheffield and Bath have recently warned that intensive farming, involving overuse of antibiotics, high numbers of animals, and low genetic diversity are hotbeds for pathogens to spread. Professor Dave Kelly, who led the study, said; "Human pathogens carried in animals are an increasing threat and our findings highlight how their adaptability can allow them to switch hosts and exploit intensive farming practices. "Human activities have had a profound effect on the Earth's ecosystems and biodiversity, particularly among livestock species, such as cattle. Escalating livestock numbers and global trade have been linked with the emergence of zoonotic diseases that pose a significant threat to both animal and human health, with the current Covid-19 pandemic being the most dramatic and serious example to date".

- 1.16 RSPCA Australia as the leading 'Animal Welfare' authority oppose intensive animal agriculture for all the above inherent issues and conclude that "Intensive farming methods involve removing animals from their natural environments and keeping them housed or confined for all, or a large part, of their lives. They are raised in large numbers under controlled conditions, commonly involving the use of hormones, antibiotics and vaccines" and, "the RSPCA opposes intensive farming practices that cause suffering or distress to animals, or that prevent the animal from moving freely and satisfying its behavioural, social or physiological needs". Alarming, approximately 40% of Australia's total beef supply and 80% of beef sold in major supermarkets is sourced from the cattle feedlot sector.
- 1.17 The National Feedlot Accreditation Scheme ('NFAS') is supposed to exist to ensure the welfare of beef cattle, however, it only provides 'guidelines' around food, water, air quality and heat levels, calling in a vet when required. There's no genuine or meaningful monitoring around adherence to the scheme with Meat Livestock Australia ('MLA') responsible for 'improving welfare' in the feedlot sector, noting, Aus-Meat Ltd lists the first objective of the NFAS mission as being to 'enhance the marketing prospects for grain fed beef'
- 1.18 Industry representatives have disproportionate influence over the animal welfare standard-setting process, resulting in welfare standards being established that fail to adequately protect animals and their very function only reinforces existing inadequate industry husbandry practices. Self-regulation and self-auditing member bodies have no regularity powers or authority and accordingly, all inclusion or reference and reliance on these industry bodies and their literature should be ignored. Self-regulation is a conflicted way of managing animal welfare because at its core it relies on a promise by industry to abide by woefully inadequate animal welfare standards, rather than meaningful monitoring and enforcement mechanisms.
- 1.19 Tens of billions of sentient beings, each with individual complex sensations and emotions, live and die on a high volume, fast-paced production line controlled by agri-businesses. The Applicant has completely failed to address these considerations, public interest and expectations and changing government policy direction. The general public including our rural communities increasingly holds high expectations that animals will be treated well and not exposed to cruelty, pain or suffering. This applies equally to animals kept for food as much as to the animals we keep as companions. The Applicant's planning proposal and accompanying SoEE fails to meet or address all these important public expectations.

**THE FACTORY
FARM HAS
SUCCEEDED IN
DIVORCING
PEOPLE FROM
THEIR FOOD,
ELIMINATING
FARMERS, AND
RULING
AGRICULTURE BY
CORPORATE
FIAT**

FOER 2009



2. PLANNING FRAMEWORK AND INSTRUMENTS

In addition to applicable planning Instruments and regulations, and Government Guidelines; Council must also take the following matters into consideration in line with Section 4.15 of the Environmental Planning and Assessment Act 1979.

The provisions of particular interest are:

- 1(b)** the likely impacts of that development including environmental impacts on both the natural and built environments and social and economic impacts in the locality;
- 1(c)** the suitability of the site for the Development;
- 1(d)** any submissions made in accordance with this Act or the Regulations and;
- 1(e)** the public interest.

- 2.1 We note the inadequate and out of date criteria outlined in state legislation which determines that the proposed development is not classified as either Integrated or Designated development in spite of the known risks and impacts associated with intensive animal agriculture and the lack of detail provided by the Applicant in their DA and SoEE.
- 2.2 It is our strong view that given the likely risks and impacts to surface water and groundwater, soil, biodiversity with the associated volume of animal effluent and consequences of run-off, odour, amenity etc, expert advice should be sought and obtained from the relevant State Government Agencies to ensure a comprehensive and informed assessment.
- 2.3 The proposed development is large scale and does include potentially hazardous, noxious and offensive uses as outlined in Schedule 3 of the Environmental Planning and Assessment Regulation 2000 . It is illogical to accept that 1,000 cattle in a feedlot will pose less risks and impacts than 1,001 cattle to local water, biodiversity and sensitive receptors.
- 2.4 When assessing intensive livestock agriculture, under Clause 36 of the above Regulation, the consent authority is required to consider:

(a) the impact of the existing development having regard to factors including:

(i) previous environmental management performance, including compliance with the conditions of any consents, licences, leases or authorisations by a public authority and compliance with any relevant codes of practice;

(ii) rehabilitation or restoration of any disturbed land;

(iii) the number and nature of all past changes and their cumulative effects;

(b) the likely impact of the proposed alterations or additions having regard to factors including:

(i) the scale, character or nature of the proposal in relation to the development;

(ii) the existing vegetation, air, noise and water quality, scenic character and special features of the land on which the development is or is to be carried out and the surrounding locality;

(iii) the degree to which the potential environmental impacts can be predicted with adequate certainty;

(iv) the capacity of the receiving environment to accommodate changes in environmental impacts;

(c) any proposals -

(i) to mitigate the environmental impacts and manage any residual risk;

(ii) to facilitate compliance with relevant standards, codes of practice or guidelines published by the Department or other public authorities.

2.5 We are concerned that the Applicant's completed and signed Development Application form includes potentially inaccurate and potentially misleading information under the heading of 'Statement of Environmental Effects Standard Form'; notably under questions, 1a and 1b, 2c, 4a and 4b, 5b, 5c, 5f, and 5g.

2.6 We further note with concern that Council has not updated the obvious issues and anomalies contained in the Glen Innes Severn Council Local Environment Plan ('LEP').

2.7 The Beardy Water Catchment (community drinking water) is still void of adequate protection. While the NSW Department of Primary Industries ('DPI') Guidelines suggest an 800-metre buffer to a Potable Water Supply Catchment, Council has failed to fulfil its obligations to commence any review or planning process to address

- 2.7 these serious risks and impacts for the protection of the local community and public health.
- 2.8 The LEP still contains land-use zoning issues and anomalies. There are more than 3 residential subdivisions in the vicinity of the proposed cattle feedlot. Council has failed to update all current zoning in its LEP which instead continues to list all parcels of land as RUI- Primary Production. Further, Council's LEP states that the minimum lot size for RUI zoning must be 150ha and yet these residential blocks range from 1-10 ha, and another several dozen additional holdings fall under the 150ha requirement.
- 2.9 The Applicant's DA and SoEE does not adequately or accurately reflect the full scale and accurate impacts of the proposed development taking into account existing development and operations and the proposed combined development which we believe will result in excessive development.
- 2.9.1 The Applicant's DA and SoEE does not include a Preliminary Site Investigation or address Clause 7 of State Environmental Planning Policy No 55 – Remediation of Land ('SEPP 55') and has therefore failed to demonstrate whether the land is capable of supporting the proposed development. To ensure a comprehensive and informed assessment in line with the planning instruments, full consideration of the accurate and evidenced land capability for the proposed intensive agricultural usage of the land, in combination with the existing extensive agriculture, must be undertaken.
- 2.9.2 The Applicant has failed to undertake or submit adequate information in response to the required assessment of Biodiversity as set out under established methodology under the Biodiversity Conservation Act 2016 which applies to all land in NSW.
- 2.10 Risks and impacts involving water, soil, amenity, odour, dust, vibration, biodiversity and biosecurity are crucial when undertaking a comprehensive and informed assessment, and rely on evidenced details about buffer zones, and must factor in considerations of local topography and weather and land capacity including all existing operations. The Applicant has failed to demonstrate how they have arrived at their conclusions and assumptions, or even confirm the methodology they have used when forming their conclusions and assumptions.
- 2.11 The Applicant's DA and SoEE includes no detailed or evidenced assessment of public interest or public and community social or

2.11

economic benefit. While new, the Applicant's DA and SoEE content under consideration represents the third application. It remains largely unchanged, and accordingly the previous hundreds of objections and valid reasons for objection, received by Council, still apply. The Applicant has completely failed to demonstrate how this proposed development is in the public interest.

3. STATEMENT OF ENVIRONMENTAL EFFECTS

While the Applicant's SoEE is substantial in quantity, overall, it is largely void of substance and the required level of detail necessary with many critical areas (impacts/risks), not identified or adequately addressed.

The Applicant has failed to identify, respond to and address all risks and impacts and cumulative risks and impacts, and has failed to demonstrate how they would monitor, avoid, minimise, mitigate and manage these risks and impacts. These omissions will make it difficult for decision makers to assess the proposed development to the standards required in line with the applicable planning instruments, and community expectations.

- 3.1 It is not sufficient for the Applicant to rely on assumptions and statements indicating they have various levels of "confidence" with many of their non-evidenced control measures and where many other potential risks and impacts are missing entirely. Such omissions prevent decision-makers from undertaking a comprehensive, objective and meaningful development assessment, in line with the applicable planning instruments and community expectations.
- 3.2 We note council's Cultural Plan 2017 incorporates concepts such as "inclusive community", "respect" and "transparency" and yet fails to demonstrate how it will uphold and implement these concepts. The last published ABS statistics (2011) confirm, "Glen Innes Severn is a diverse community" of 8,656 people, with those who identify themselves of indigenous origin making up 488 people (6.6% of the population) - compared to the national average of 2.5%. The local Indigenous population is therefore significant and yet appears to have been disregarded from being an inclusive community, afforded respect and transparency.
- 3.3 Of serious concern, the Applicant's DA highlights a noted lack of consultation with the Ngoorabul people who are identified as the cultural parties for the area, the immediate neighbours, the broader Glen Innes community, and other key stakeholders as required under various NSW planning instruments and council's own integrated strategic and planning commitments. We further contend that this lack of consultation by the Applicant does not align with the objectives and principles outlined in the Glen Innes Severn Council Community Participation Plan, including the concept that, "community engagement will be inclusive, transparent and ensure fair participation."
- 3.4 While the SoEE confirms on page 21, under Section 2.10 CULTURAL HERITAGE, "The generic due diligence assessment involves five steps which are addressed below", the Applicant's Consultant has failed to

- 3.4 adequately address all these five steps. The Applicant's cursory and almost dismissive attention to Aboriginal Heritage and the Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales, is indeed highly offensive.
- 3.5 In line with the mandatory Cultural Heritage Guidelines, it is imperative that the development should not proceed without a detailed Aboriginal Cultural Heritage Assessment ('ACHA') or Aboriginal Heritage Impact Permit ('AHIP') being undertaken at the Applicant's expense. We request Council to note the significant lack of available Aboriginal Heritage mapping in the region and refer Council to Appendix E, Aboriginal Heritage and Information Management System ('AHIMS'), which states, in part;
- 3.5.1 AHIMS only records information about Aboriginal sites that have been provided to Office of Environment.
- 3.5.2 Information recorded on AHIMS may vary in its accuracy and may not be up to date. Location details are recorded as grid references and it is important to note that there may be errors or omissions in these recordings.
- 3.5.3 Some parts of New South Wales have not been investigated in detail and there may be fewer records of Aboriginal sites in those areas. These areas may contain Aboriginal sites which are not recorded on AHIMS.
- 3.5.4 Aboriginal objects are protected under the National Parks and Wildlife Act 1974 even if they are not recorded as a site on AHIMS.
- 3.6 It is not sufficient for the Applicant to merely state that the proposed site is disturbed land or that a search of the AHIMS for Lot 1/DP7243 failed to locate any Aboriginal Heritage details. We strongly disagree with the Applicant's statements, "No other sources of information are available" and, "it is reasonable to conclude that there are no known Aboriginal objects or a low probability of objects occurring in the area". The Applicant has failed to seek or obtain other sources of information and indeed has failed to consult at all.
- 3.7 If approved, this development will threaten the health and biodiversity of the local ecosystem. Intensive animal factory farms pose significant negative environmental risks and impacts to our unique rural landscapes. Indeed, developments such as the proposed application have been an ongoing source of environmental damage and land use conflicts. Such instances have included toxic run off, soil, surface water and groundwater contamination, explosions and fires.
- 3.7.1 Evidenced impacts on biodiversity frequently includes

- 3.7.1 widespread animal displacement, loss of habitat including important wildlife corridors, and the suffering and death of an increasing number of vulnerable, threatened and endangered wildlife. It is now estimated that around 3 billion animals were killed or displaced during Australia's 2019/2020 bushfires. This tragic event has been described as the worst single event for wildlife in Australia, among the worst in the world, and is likely to push some species into extinction. Decision makers now have a clear responsibility to ensure their decisions do not further contribute to this extinction trajectory.
- 3.7.2 The 'precautionary principle' must be applied in environmental planning decision-making with the conservation of biological diversity and ecological integrity being a fundamental consideration. The 'precautionary principle' requires decision-making to give the environment the benefit of the doubt.
- 3.8 The proposed site's topography and local historical weather patterns confirm that the proposed site is unsuitable for development of the kind proposed. The risks and impacts to the local community, as well as the local Beardy Waters catchment, groundwater, threatened biodiversity and ecosystems are substantial. The proposed development will result in significant conflicts of land use, and amenity issues for immediate neighbours and will have a serious detrimental effect on their way of life and peaceful existence and physical and emotional health and wellbeing.
- 3.8.1 Globally, evidence confirms and experts agree that industrial, intensive farming – such as that proposed by the Applicant pose real and serious threats to public health and safety and the environment including our natural resources and biodiversity.
- 3.8.2 The peaceful 'country life' that community members value and seek is directly threatened by the development of intensive farming facilities that pose a risk to the environment, animal welfare, and – in a less tangible but equally important sense – the 'livability' of our rural and regional communities.
- 3.9 Intensive animal agriculture directly contributes to the loss of critical Aboriginal heritage, rapid decline in biodiversity, land clearing and degradation, soil erosion and contamination, lack of surface and groundwater security, pollution including emissions caused by animal agriculture, and appalling animal cruelty – all of which are broadly held and valid concerns, in the Glen Innes area and beyond.

3.10 An extreme weather event with heavy rainfall – which are becoming more frequent as a result of climate change, would cause the property to be inundated with resulting runoff from the feedlot pens containing organic and mineralised manure constituents to result in a significant pollution event and ecological hazard. Even more concerning is the threat of an effluent holding pond spill as a result of high rainfall, which would cause catastrophic damage to the water system, death of aquatic animals and potentially impact human health. The risks and impacts are extreme based on the evidenced weather history and potential consequences.

3.10.1 Cattle farming, especially intensive farming in the form of feedlots, is extremely water intensive. The surrounding region and state has been drought declared for years, and we need to protect and preserve this precious resource for the benefit of all current and future generations.

3.9 Intensive animal agriculture directly contributes to the loss of critical Aboriginal heritage, rapid decline in biodiversity, land clearing and degradation, soil erosion and contamination, lack of surface and groundwater security, pollution including emissions caused by animal agriculture, and appalling animal cruelty – all of which are broadly held and valid concerns, in the Glen Innes area and beyond.

3.8.2 The peaceful 'country life' that community members value and seek is directly threatened by the development of intensive farming facilities that pose a risk to the environment, animal welfare, and – in a less tangible but equally important sense – the 'livability' of our rural and regional communities.



STATEMENT OF ENVIRONMENTAL EFFECTS

3.16 The concentration, storage and dispersal of manure leads to high levels of local air and water pollution. In addition, runoff of nitrogen-rich manure into waterways can contribute to “dead zones”. Cattle feedlots generally also cause an imbalance of soil nutrients, particularly of nitrogen (N), increasing the N concentration in soil surface, which may eventually lead to water, air and soil contamination.

3.17 There are significant concerns regarding the dispersal of the waste, storage, pollution and odour. On average, a cow produces 20kg of solid waste daily - a staggering amount. This will attract vermin including flies, and will have an extremely negative impact on biodiversity and poses a serious biosecurity risk.

3.18 In addition to the manure that will be produced, mortality rates are common with cattle feedlots, meaning large animals will be added to the compost ongoing. This will further exacerbate the presence of unwanted wildlife (“vermin”), impact local biodiversity and pose additional biosecurity risks. The Applicant’s DA has not adequately responded to how they would address these risks and impacts.

3.19 We note the Applicant refers to offsite effluent management (removal to off-site locations) but has gone outside of the scope of the lodged DA which only applies to onsite effluent management and failed to elaborate or indeed provide any information at all regarding requirements concerning removal of effluent to off-site locations. **The information provided by the Applicant regarding the storage, containment and spreading of effluent is patently inadequate** and fails to address the serious corresponding risks and impacts involved.

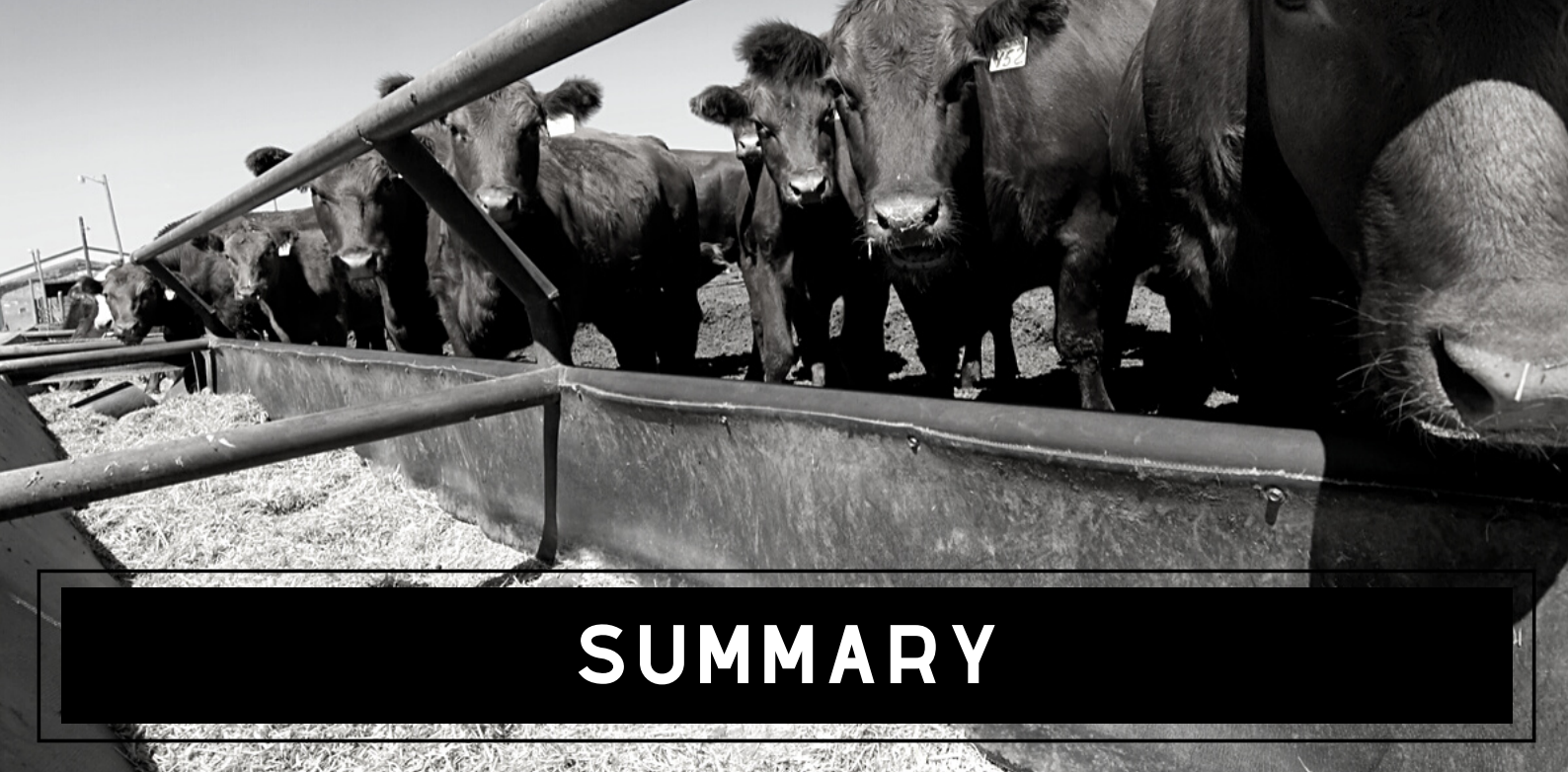
3.20 In general, **the information provided by the Applicant regarding manure management and the corresponding sedimentation basin and effluent holding pond, stormwater management and cattle mortalities is woefully inadequate for the purposes of a comprehensive planning assessment of the risks, impacts and ongoing cumulative impacts.** While the Applicant provides a scant reference to cattle mortality, he provides no evidenced estimates of numbers and assessment of the risks, impacts and land capacity cannot be undertaken.



**STATEMENT OF
ENVIRONMENTAL EFFECTS**

3.21

Apart from facilitating private business, **the proposed development offers no benefits to the local community.** Rather than allowing damaging, intensive animal agriculture to flourish in the region, we urge the Glen Innes Severn Council to instead look at encouraging and approving sustainable ventures that work in harmony with the environment and align with social expectations, council values and enrich the region, thereby improving the health and wellbeing of all current and future generations.



SUMMARY

In summary, some of the many serious negative risks, impacts and consequences with intensive cattle feedlots include:

4.1 Waste can emit strong odors and pollute surface water, groundwater and soil, because livestock produce prodigious amounts of faeces and urine. The risks and impacts to the environment, biodiversity and ecosystems are substantial and also include excessive use of and the depletion of precious and limited resources like water.

4.2 Poor waste containment and management practices can lead to outbreaks of disease and heightens serious biosecurity and public health risks and impacts.

4.3 Crowded, dirty and stressful conditions in which animals are kept necessitates the heavy use of antibiotics necessary to control disease and leads to antibiotic resistance, a now global issue for animals and humans alike.

4.4 Ethical and moral considerations including cruelty to animals and public views and expectations about industrialised intensive animal agriculture and a greatly heightened concern about the vulnerable status of Australia's wildlife, biodiversity and ecosystems.

4.5 **In their DA and SoEE, the Applicant has failed to identify, respond to and address all risks and impacts and cumulative risks and impacts, and has failed to adequately demonstrate how they would monitor, avoid, minimise, mitigate and manage these risks and impacts.**



CONCLUSION

5.1 We acknowledge and appreciate the technical complexity of this proposed development and the difficulty and challenges faced by even the most experienced planning staff when assessing such information that frequently requires experienced, expert and scientific evaluation. We also note that in line with the applicable legislation and planning instruments, Council is required to ensure the assessment review remains **independent, objective and informed** during the entire process and that the assessment process is strongly founded on informed opinion and evidence.

5.2 Glen Innes Severn Council as the primary consent authority, is required to thoroughly assess **the adequacy of information provided and the measures proposed by the Applicant, to mitigate any potential risks, adverse impacts including cumulative impacts**. This is clearly outlined in the *Environmental Planning and Assessment Act 1979* which requires Council give **due consideration to social impacts and public interest relating to any proposed development**. All these considerations are accordingly a necessary and integral part of **any comprehensive, objective and meaningful development assessment in line with the applicable planning instruments**.

5.3 Glen Innes Severn Council is compelled to act impartially and ensure the correct and consistent application of local, state and federal legislation, including the objective and transparent assessment of planning proposals. Councillors are elected to represent everyone in the community, and apply objective, impartial and informed consideration of matters which hold strong public interest.



CONCLUSION

5.4 It is imperative that decision makers don't trivialise, dismiss or ignore public interest, or place the unsustainable, short-term, economic benefits of a privately owned commercial business ahead of the welfare of animals, the environment or the long-term best interests of the broad community. We have a clear moral, social and environmental responsibility to reduce the number of intensive agri-businesses, including cattle feedlots such as that proposed by the Applicant; not expand them or endorse their approval. In addition to the individual risks and impacts outlined in our objection, when combined, these are glaring and serious cumulative risks and impacts where adequate monitoring, avoidance, minimization, mitigation and management would prove to be problematic and indeed, impossible.

5.5 The 'precautionary principle' must be applied in environmental planning decision-making, and conservation of biological diversity and ecological integrity should be a fundamental consideration. The 'precautionary principle' requires decision-making to give the environment the benefit of the doubt. The Applicant's professed benefits to the Glen Innes Severn region are negligible and come with an exorbitant and costly price tag of imminent and serious risks and impacts. There is no justification for the extensive and permanent consequences to animals, the local environment including precious resources, and the amenity and public health of the Glen Innes Severn community.

5.6 The true and often hidden risks, impacts and costs of the industrialisation of animal agriculture impact us all; current and future generations, the planet and all her inhabitants – Animals, the Environment and People. Importantly, in addition to the individual risks and impacts, and cumulative risks and impacts, the 'Precautionary Principle' must be applied in environmental planning decision-making and conservation of biological diversity and ecological integrity, should be a fundamental consideration. The 'Precautionary Principle' requires decision-making to give the environment the benefit of the doubt.

5.7 Based on our points of objection, it is our strong view that the Applicant has failed to adequately address or respond to the mandatory assessment criteria as outlined in applicable legislation and planning instruments. This assessment and corresponding decision making must take into account, the 'Precautionary Principle' requiring decision-making to give the environment the benefit of the doubt.



**WE THANK COUNCIL FOR
READING AND CONSIDERING
OUR POINTS OF OBJECTION.
FOR ALL THE REASONS
OUTLINED ABOVE, AT THE
CONCLUSION OF YOUR
COMPREHENSIVE, OBJECTIVE
AND INFORMED ASSESSMENT,
WE URGE GLEN INNES
SEVERN COUNCIL, AS THE
CONSENT AUTHORITY, TO
REFUSE THE JARDANA PTY
LTD DA FOR AN INTENSIVE
CATTLE FEEDLOT.**

ANIMAL LIBERATION

SOURCES AND REFERENCE MATERIAL

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