Comments on the deficiencies and omissions in the revised Development Application for:

Application No: MCU12.0184 & ERA 12/0087

Development Type:

Development Permit for Material Change of Use of Premises (Animal Husbandry Type 2 - Intensive)

Development Permit for Material Change of Use of Premises for an Environmentally Relevant Activity (ERA 4 - Poultry Farming)

136 Top Forestry Road, Ridgewood QLD 4563

Submitted by:
No Broiler Farm Cooroy
PO Box 450
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Includes comments based on advice received from environmental consultant Peter Edmiston B.App.Sc.(Hons), M.Phil, Principal Consultant and Director, **BioTrack Pty Ltd**
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Date: 30 September 2013

Introduction

The MWA Preliminary Operational Plan suggests the Applicant will apply best-practice management, if he obtains approval to operate the proposed chicken meat farm on his property in Ridgewood, Queensland. MWA Preliminary Operational Management Plan Page 18

Ridgewood is a quiet rural area, with scenic valleys, steep ridges and winding roads, and the Applicant's property is no exception. It is impossible to understand how best-practice management could be implemented on his property, since the reports and documents supplied to the Sunshine Coast Regional Council in support of the proposal do not take into consideration the property's unique geographical character.

In particular, the steep slopes and valleys lead down to a sensitive riparian environmental area, a waterway used by the many landholders downstream for domestic and stock use. The extreme weather events experienced during the wet season in the West Cooroy area, make spreading composted chicken litter around this property a potential environmental hazard, both for the landholders downstream and for the endangered frog species that inhabit Blackfellow Creek.

Also, the topography of the surrounding valleys will greatly enhance the transmission of the noise, odour and dust from the chicken shed to neighbours and other properties. This issue has been inadequately addressed in the documentation presented to date.

The rural road leading to the property is unsealed, winding and narrow, and cannot be improved to a standard that would ensure safety to the school buses, garbage trucks, residents, and cyclists that would share the road at the same time as the 19-metre B-double trucks and semitrailers.

Therefore, the development proposal fails to address these concerns in sufficient detail to provide assurance of an acceptable outcome.

Further, there is the strong possibility that financial, practical and environmental constraints will preclude the implementation of recommended measures to minimise harm and nuisance. Also community concerns will be ignored, as there are no planned strategies for managing community liaison regarding communication strategies, including the handling of complaints as is recommended in the Queensland Guidelines for Meat Chicken Farms. Qld Guidelines Meat Chicken Farms

This submission covers the following topics:

1. Traffic Issues
2. Water Issues
3. Waste Issues
4. Air Quality, Emissions and Noise
5. Environment
6. Financial Viability
7. Effects on Property Values

1. Traffic Issues

The development would significantly increase the amount of traffic using Top Forestry and Old Ceylon Roads. Top Forestry Road is an unsealed, winding road is unsafe for regular vehicles, and very unsuitable for heavy vehicles. An increase in the volume of traffic and use of large trucks during construction and operation will make the road dangerous for local residents and other road users. Because the cycle of Council road maintenance is at best annual, local residents will have to suffer sub-standard roads for months on end.

The usual condition of Top Forestry Road is poor, as it is potholed, rutted and slippery with clay when wet, and corrugated and slippery with loose gravel when dry. Accidents are a regular occurrence. The significant increase in heavy truck movements associated with the broiler farm would lead to greater and more rapid degradation of its surface and edges. There are places where it is impossible to safely pass another car, let alone a large heavy vehicle.

There are only 32 properties adjoining Top Forestry Road and the section of Old Ceylon Road that connects it to the Cooroy-Belli Creek Road. Therefore, to extrapolate recorded traffic statistics for Cooroy-Belli Creek Road and apply them to these roads, to arrive at the calculation of a 4% traffic increase assumed in the Hayes Traffic Report (page 11), is misleading.

Even without base data for these roads, the increase in traffic from the broiler farm operation on these two roads will obviously be well above the 5% that constitutes an insignificant increase and therefore warrants a much more thorough analysis of the traffic than the incomplete analysis contained in the several versions of the Hayes Traffic Reports.

As well, the volume by weight of vehicle will certainly be greatly increased.

Traffic report omissions

- No start and end location for:
  1. Vehicles delivering day-old chicks
  2. Vehicles transporting mature chickens
  3. Vehicles transporting waste material from the site

- No mention of the effects of the increased heavy traffic on the status of Cooroy-Belli Creek Road as a Cyclists Training Route.

- No mention of the dangers involved with allowing heavy vehicle movements along school bus and garbage truck routes on Top Forestry, Old Ceylon and Cooroy-Belli Creek roads.

- While B-double routes for 19-metre trucks may not be subject to TMR approval, there is no guarantee from Inghams Enterprises, or or other operators or contractors, that larger B-doubles will not be used to supply birds and feed when operational necessity demands it.

- Hayes Traffic Report (page 10) states: "The staff manager resides on the site

and therefore no additional staff trips are required".

The Applicant has stated in the *Noosa News* (29 August 2003) that, on completion, there will be an additional 6-8 permanent jobs for locals in maintenance, supervision, and administrative positions along with additional jobs for casual labourers. More recently, on *Channel 7 News* (23 September 2003), he announced the prospect of 10-12 jobs. However, the traffic for these trips is not mentioned in the Traffic Report.

- No accounting for the removal of up to 60,000 per year dead birds in the traffic plan (based on the accepted 4% mortality rate).

- Hayes Traffic Report makes no mention of the traffic that would be generated by heavy vehicles **removing** tonnes of waste (shed) litter, a necessity that is now part of the revised development application.

- Although the MWA Preliminary Operational Management Plan (page 7) states: Estimated 8 trucks to deliver litter for 8 sheds over a period of 3 days, the Hayes Traffic Report makes no mention of traffic generated by shed litter **deliveries**.

- No plan to improve the surface of Top Forestry Road or ameliorate the dust nuisance to properties along the road.

- Road "improvements" suggested in the latest Hayes report include removing roadside vegetation, which acts as a dust screen for some properties.

- The Applicant offers no financial contribution to substantial and necessary road improvements if Top Forestry Road is going to be a safe and usable road. In fact, the continuing road maintenance due to heavy vehicle usage of Top Forestry and other local roads would become a burden on ratepayers.

Road safety

The Hayes TER makes several recommendations regarding the upgrading and maintenance of Top Forestry Road necessary for the farm's operation (pp12-14; Appendix C, page 19). These include:

- widening the road to 7 metres to allow a car to pass a moving truck at 50kph. NOTE: There is no mention of the minimum road width required for two moving trucks to pass safely.

- the removal of roadside vegetation in three main areas.

NOTE: This vegetation, which includes mature native trees and shrubs as well as exotic species, is stabilising the edges of the road. Its removal would lead to erosion and subsidence of the road edges.

2. Water Issues

Stormwater Issues

The stormwater studies need to be critically reviewed. For example, for the Stormwater Treatment and Water Quality Management Plan (Version 3 - September 2013) the performance of the proposed stormwater controls has been modelled using MUSIC.
Peter Edmiston, pers comm

Has MUSIC been validated using high strength runoff from intensive animal industries? Also, unless the study covers the full range of atmospheric conditions it cannot be regarded as complete. It is unclear whether other proposals relying on these "studies" have resulted in adverse outcomes for residents despite optimistic predictions. The success of these past studies is unknown and needs to be checked before they are considered valid. Just because a model has been used to describe a process does not imply any level of accuracy.
Peter Edmiston, pers comm

Callighan & Toth have used a conventional stormwater design tool (MUSIC). Unfortunately, such an approach is all too often a highly simplified description of what can be modeled, using no site measurements and no calibration. It relies upon assumed values and assumed environmental responses because that is all they have to work with. The modelling does not appear to cover the orchard, which is where the composted litter is to be spread. The MUSIC data needs to be carefully reviewed by an independent organisation/person who fully understands the way the model works.
Peter Edmiston, pers comm

Stormwater runoff from areas fertilised with poultry litter will contain solutes and solids associated with the litter. No system will provide 100% retention, except perhaps confinement in a properly lined landfill. If the receiving environment is sensitive to nutrients, microorganisms and pharmaceutical products, then this needs to be carefully studied. The assumption that substituting inorganic nutrient from synthetic fertiliser with poultry litter will result in the same outcome is not valid unless carefully studied. Plants will utilise nutrient as it becomes available, but the off-site loss of nutrient and other material remains to be quantified.
Peter Edmiston, pers comm

Water quality management plan
Because runoff from the majority of the avocado orchard will continue to be directed to onsite dams, Stormwater Treatment and Water Quality management Plan Plan Page 29, there needs to be a management plan for water quality affected by the movement of composted litter into the dams following heavy rains.

Note 1. The sediment basin for Bunded Area Three is around 50m from Dam 2 and will overflow into it during the wet season.

Note 2. Water from the dams is earmarked as reserve potable water for the broiler operation when collected water levels are low. This water will not be suitable for use in the chicken sheds until purification.

Downstream of the Applicant's property live 23 people on nearly 1000 ha, who rely on the water from Blackfellow Creek for either cattle water (directly or pumped) or for irrigating crops or gardens. They should not have their livelihoods and general quality of life put at risk. See file at the end of this section.

- There is no mention of pathogens or pharmaceutical contaminants. See the Reference from the QLD Government. Downstream respondents will be interested to read through the properties of the litter.
  Peter Edmiston pers comm

• There is no plan to ameliorate stormwater runoff from shed litter deposited beneath the fruit trees and being carried to the natural drainage lines that lead to local watercourses. See **Photo 1** of gully erosion on the Applicant's property and **Photo 2** of the topsoil from the orchard in Blackfellow Creek North and its riparian banks.

Photo 1 Gulley Erosion on the property 136 Top Forestry Road Cooroy.

Photo 2 Silt residue in Blackfellow Creek North adjacent to the property 136 Top Forestry Rd

- No estimate of the effects of extra nutrients on riparian native vegetation.

- The Applicant has not indicated how water from the sheds roofs, subject to dust fallout from the shed extractor fans, will be made potable, as per Inghams Enterprises specifications.

Water Quality

The litter would be spread in the avocado orchard, which will allow nutrients to enter the environment in excess of naturally occurring levels.
After the litter is spread on the ground, water (from rain or irrigation) carries nutrients into the ground – depth dependent on waterlogging and cracking clay. Soluble elements are available for root uptake, but not all would be required by the avocado trees.

During dry periods, soluble elements in excess of requirements are drawn to the soil surface by capillary action. The water then evaporates, leaving a residue on the surface, which can then be carried away by wind or next rainfall run-off. Insoluble or slowly soluble elements bind with soil and are not available for root uptake. Soil erosion exposes bound elements to transport by wind and water.

List of properties downstream of the broiler farm proposal.

PROPERTY	AREA (ha)
BLACKFELLOW NORTH	
438 MCH 409	69.39
2 SP221091	68.51
2 RP196433	71.67
STATE FOREST	
3 SP216099	151.80
22 RP869358	13.40
16 RP864127	32.51
21 RP869358	9.78
2 RP207526	16.26
BLACKFELLOW	
21 SP115863	55.44
1 M37804	3.72
11 M37804	19.25
5 RP174813	25.37
13 RP219722	12.02
12 RP221534	12.01
11 RP 225543	12.00
10 RP225543	28.77
5 RP216205	2.07
9 RP225543	12.05
5 SP100055	63.48
BELLI	
1170 M37520	88.55
193 MCH3511	93.92
66 MCH328	30.35
1 RP60148	54.63
TOTAL NUMBER	23.00
TOTAL AREA	946.95

3. Waste Issues

The Stormwater Treatment and Water Quality Management Plan (Callighan & Toth) page 28) cites an agronomist's report that contains a major discrepancy. Even allowing for substantial attenuation of nutrient (above the high rate of fertiliser requirement) the predicted runoff exceeds the 0.5 mg N/L and 0.05 mg P/L water quality objective by a factor of more than 100. All these calculations would need to be carefully checked before they can be taken seriously.
Peter Edmiston, pers comm

Compost Turning Machine
It has been determined by the proponent that the use of a compost-turning machine (towed behind tractor) will be the most efficient means of stockpiling and processing the spent litter and maintaining aerobic conditions to minimise odour emissions during the stockpiling period. Potential systems are manufactured by 'JPH Equipment' and Seymour Rural Equipment Pty Ltd and can integrate stockpile covers (i.e. pick and replace covers after the turner passes along stockpile.
MWA Preliminary Operational Management Plan (p 16)

However, according to the sales manager of Seymour Rural Equipment Pty Ltd (pers comm), their compost-turning machine does not work well as a plastic sheet lifting and lowering operation. PH Equipment do have a machine that handles plastic sheeting (pers comm), but there is no indication (in the MWA POM Plan) how the operation would work with plastic sheeting that will need to be tightly secured on the windy ridge tops.

Bunded Areas
Prior to the on-site use of spent shed litter, it should be stockpiled on an impervious base, out of public view and in a location that is not exposed to prevailing winds. Reference page 18 of the Stormwater Plan

Although the compost will be covered, the bunded areas will be fully exposed to the elements. Bunded Area 3 would produce runoff with a very high nutrient concentration, and nitrogen and phosphorus levels that would exceed untreated sewerage would be expected. It is asking much from MUSIC to deal with this type of water.
Peter Edmiston, pers comm

Litter management
Litter can be replaced either completely at the end of each batch or partially reused. Typically, litter moisture content and odour emissions are more readily managed if fresh litter is used for each new batch, but ultimately this is a function of the management of the farm.
MWA Environmental Preliminary Operational Management Plan 11 September 2013 Page 6

Shed floor litter depth will be reduced to as low as 45 mm with litter reuse at manager's discretion. MWA Preliminary Operational Management Plan Pages 6 and 10.

It appears that corners are being cut with shed litter quantities and the reuse of litter could lead to bird health and odour issues.

The critical test with litter reuse is whether chicken performance, biosecurity and bird health can be maintained.

Composting

Composting times (given in the Preliminary Operational Plan) of 4-5 weeks are less than half that of industry standards for full composting that gives a thorough treatment of the pathogens.

Reference: Chicken Litter Issues Associated with Sourcing and Use by G A Runge, P J Blackall, K D Casey January 2007

The bunded compost areas will not be protected from rain. This could lead to the leaching of contaminants into the surrounding area, from an overflow of bunded areas, following heavy rainfall that becomes too much for the bio-retention basins to handle.

The applicant now plans to move excess waste litter that cannot be stockpiled off the property. MWA Preliminary Operational Management Plan Page 15. No waste management plan that includes details of where and how litter will be disposed of off site, has been submitted. The waste should be removed by a licensed waste disposal contractor and deposited at an authorised waste disposal station.

4. Air Quality, Emissions and Noise

Odour

The MWA odour impact study only accounts for properties less than 1 km away, rather than a meaningful distance based on odour transmission for comparable broiler shed operations, so that the number of people impacted by odour is greatly underestimated.

There is no accounting for the impact on the **existing** two houses on the applicant's property. Probable Solution 1.2 of the Intensive Animal Industry Code sets out the minimum separation distances to existing and proposed dwellings on adjoining lots. For a poultry farm, the distance is 1000 m. Details should be provided showing how the proposal complies with this requirement.

There is no operational plan of how potentially odour-generating materials would be loaded and transported. Dust and odour travel in the wind, which is shown clearly in this video here.

Odour modelling methodology

The odour modelling (MWA Environmental Odour Issues page 5) uses data gathered from the Queensland Health Study of the Narangba Industrial Estate, which has different climatic and wind conditions than the hinterland site at Ridgewood/West Cooroy. Because of the area's stable atmospheric conditions (and often minimal turbulence), the broiler shed exhaust plumes will resist mixing, dispersion and dilution. This will allow exhaust plumes to travel significant distances, largely undiluted.

Neutral atmospheric conditions generally occur during overcast conditions (day and night) as well as during the day, when wind speeds are moderately high. Vertical mixing of air is moderate and plumes will tend to neither rise nor descend (neutral buoyancy). Queensland Poultry Science Symposium – 2007 Mark Dunlop, David Duperouze, and David Featherston.

Therefore, stating, as the MWA Odour report does, that the applicant's operation can comply with 'relevant odour amenity criterion (page 6)' appears based on flawed assumptions and methodology.

Odour and litter

Further, composted litter spreading will be an ongoing activity given that 7000 m2 is to be distributed around the property over 12 months and even though odour may deplete following application, it will not be 'substantially reduced over several days (MWA Odour report page 7)' because there will be continual litter application throughout the property and there will be many times when wet weather brings the litter odour back for weeks at a time. When the litter is spread, the odour can last for days or weeks depending to weather conditions. Reference

The "minimum setback of 50 metres from the southern, eastern and northern property boundary (page 8)" is just a token gesture, since this represents a

minimal percentage of the distance odour and dust will travel.

The huge litter storage area planned adjacent and running northwest from Shed 5 is a massive potential source of odour, particularly when it is turned and if it gets wet from soakage via the bund-collected water. This storage area is now significantly closer to the northern neighbours' properties.

Windrowing and litter removal are not included when estimating odour emissions, and consequently odour and dust emissions are underestimated.

Dust

Dust hazards from broiler farms is a relatively new field of scientific research and there is a body of material that needs to be presented in any thorough broiler farm development application, to inform those likely to be affected.

The major nutrient pathways will be atmospheric fallout from dust, runoff from the composting areas and runoff from the fertilised orchard areas. Since there is no mention of the atmospheric effect by MWA, this needs to be quantified.
Peter Edmiston, pers comm

Bio-aerosols have the potential to transport a broad spectrum of pathogens through atmospheric transport and deposition. The hazard distances are large. For example a 5-20 micron particle can be transported many kilometres. Microorganisms within a dust particle are protected against UV and dessication.
Peter Edmiston, pers comm

Therefore bio-aerosols remain a very important mechanism for disease transmission. The poultry industry maintains large separation distances between breeding facilities to guard against this type of disease movement. It is reasonable to expect a similar level of protection to be extended to those living within the transmission distance from the proposal site.
Peter Edmiston pers comm

The results of a 'Survey of Bioaerosol Emissions from Australian Poultry Buildings' (2007) indicate that particles emitted from chicken sheds may contain a considerable amount of airborne allergens. Humans, particularly sensitive individuals, exposed to fungal aerosols at the concentrations measured in this study may be at a health risk. The health risks to humans exposed at distances from the sheds is, however, uncertain as there would be dispersion of aeroallergens over distance.
Survey of Bioaerosol Emissions from Australian Poultry Buildings, V. Agranovski1, T. Reponen2, and Z. D. Ristovski 2007

Dust and the collection of rainwater

No particulate matter analysis of the toxic dust emitted from the sheds or fallout impact on rainwater collection by district properties has been included in the Development Application.

People using roof water as a drinking water supply and people with a low resistance to infection are particularly vulnerable. The chickens are treated

using pharmaceutical products to suppress and/or treat diseases. The microorganisms leaving such facilities are likely to be resistant to a range of products and therefore represent a higher risk factor than posed by non-resistant organisms.
Peter Edmiston, pers comm

Dust and Top Forestry Road
Since Top Forestry Road is unsealed, increased traffic will be a big generator of dust. In relation to this road, the MWA Environmental report does not take into consideration:

1. That the amount and spread of road dust raised by vehicles increases with their speed and weight.

2. The removal of roadside vegetation as per Hayes TER also removes living dust filters from adjacent properties

Noise

Noise from the proposed broiler farm will be a major concern to residents living up to 3 km from the site, both day and night.

Noise levels vary and are influenced by atmospheric conditions, wind, temperature and relative humidity and by topography. Since the operation is set on ridge tops, this will increase noise levels by reflecting or channelling noise towards various locations, further exacerbated in the quiet of night.

Noise is invisible so its impact on the surrounding environment is more difficult to quantify. However, the effects of noise are very real. Noise is not a 'non quantifiable' emission and its effects cannot be described as indeterminate. It is a misconception that people can adjust to noise by ignoring it or getting used to it. The ear responds to sounds even during sleep.

A thorough noise impact study has still not been presented to Council.

On-site sources of noise include:
1. Vehicles and operational machinery.

2. Shed ventilation systems and piped music (the latter from interview with the applicant Noosa News 29 August 2013).

3. Shed alarm systems, power failure alarms, back-up power generators, bobcats, maintenance vehicles, feed blowers, grounds maintenance and seasonal use of water pumps.

4. Night collections of birds ready for processing.

5. Feed delivery blowers.

Off-site noise
Day and night light and heavy vehicle deliveries, and pick-ups of feed, litter, materials, birds (alive and dead), and staff travel are all contributors.

We are informed that the chickens are caught and placed in cages during the night, but not how often and at what times. Inghams Enterprises uses steel cages, so the noise in the early hours of the morning will travel for kilometres. We know this because people living 2km away can hear the Applicant run his water pump.

Truck noise
The intensity of sound is governed by speed, truck type, age of vehicle, roadway surface, tyres, roadway geometrics, terrain, micormeteorology and the geological structure of the area.

At lower speeds, and when accelerating or braking, engine noise can dominate.

Trucks contribute a disproportionate amount of noise, not only because of their large engines, but also the height of the diesel stack and aerodynamic drag. Their reversing alarms are very piercing and the sound will travel a great distance.

Added to the truck noise will be the noise of the forklifts used to transfer the chickens to the trucks. Forklift operational noise (including reversing alarm) is comparable to a bulldozer and will be a constant at night.

Summary
MWA reports do not indicate the measurable quantities of odour and dust and the intensity of noise that farm operations and associated vehicle movements will create. The MWA POMP (page 17) does indicate that prevailing NE-SE winds will carry these elements towards the State Forest, however local topography has a greater influence than winds on transmission direction and distance. It also is worth noting that during winter and early spring of 2013 that SW-NW winds are common.

The generation and transmission of odour, dust and noise associated with the farm operations and vehicle movements along the haul route will adversely affect the quality of people's lives. The Applicant fails to address these concerns in sufficient detail to provide assurance of an acceptable outcome.

	Noise	Odour	Dust
Source			
On-site			
Vehicles	yes (diesel)	yes	yes
Machinery	yes (diesel)	yes	yes
Shed extractors	yes	yes	yes
shed music			yes
Live chickens	yes	yes	yes
Carcasses	yes		
Litter composting	yes	yes	
Litter spread	yes	yes	
Haul route			
Vehicles (day & night)	yes (diesel)	yes	yes
Live chickens	yes	yes	yes
Carcasses	yes		

5. Environment

Frogs
Several endangered and vulnerable frog species have been noted in Blackfellow Creek, including the endangered Giant Barred Frog and Cascade Treefrog, and the vulnerable Tusk Frog.

Frog surveys of Blackfellow Creek were carried out when the Mary River catchment area looked like being flooded by the Traveston Dam. (See attached report.) Another frog survey will be undertaken during this coming wet season by Eva Ford, Catchment Officer (Threatened Species Project) Mary River Catchment Coordinating Committee.

Spotted-tailed quolls
Northern quolls and Spotted-tailed quolls are known to occur in this area. In 2009, a survey was completed by Dr Scott Burnett (a quoll biologist now working at Sunshine Coast University), for the Wildlife Preservation Society of Queensland. See page 24 of the report available online: *Quolls in the Southern Mary River Catchments, SEQ*. The survey has identified a quoll sighting in 2006-2007 from Old Ceylon Road, before the turnoff to Top Forestry Road, West Cooroy. Other quoll sightings have been reported north and south of this location in this report. Reference.

Spotted-tailed quolls are highly mobile and can move between 6-21 km in one night. Spotted-tailed quolls are listed as endangered under the Environment Protection and Biodiversity Conservation Act (EPBC Act) and are listed as vulnerable under the Nature Conservation Act (QLD).

Spotted-tailed quolls are at a greater risk of road kill because they will scavenge roadkill from roadsides. The increased heavy vehicle movement associated with the proposed chicken farm places quolls and other wildlife species at a greater risk of injury and death. Since Spotted-tailed quolls are listed as endangered under the Commonwealth's EPBC Act, this proposed MCU needs to be urgently referred to the Federal Government.

The EPBC Act requires proponents to obtain Commonwealth approval, if an action is likely to have a significant impact on matters of National Environmental Significance (i.e. endangered species).

We realise that the responsibility for referring an action to the Commonwealth Environment Minister lies with the person proposing to take that action.

Therefore, since there are several endangered frog species and an endangered marsupial likely to be affected, we request that the Sunshine Coast Regional Council encourage Mr Milligan to refer his proposal to the Commonwealth Environment Minister (Compliance and Enforcement Branch, Environment Assessment and Compliance Division, Department of Sustainability, Environment, Water, Population and Communities) for assessment.

Wildlife and Roadkill
This area has significant biodiversity. The proposal would be located next to the West Cooroy State Forest and also has the potential to adversely affect other nearby reserves and vegetation on private property. An increase in heavy vehicle movement along Top Forestry Road, Cooroy-Belli Creek Road and other local roads will result in an increase in wildlife deaths and injuries to all fauna species, especially koalas, kangaroos, wallabies, snakes and tortoises. This proposed MCU needs to be urgently referred to the Federal Government for this reason.

Fauna records (individual counts)

Waterway name	Location	Date	Adelotus brevis	Limnodynastes peronii	Litoria fallax	Litoria gracilenta	Litoria latopalmata	Litoria latopalmata/nasuta	Litoria pearsoniana	Litoria peronii	Litoria rubella	Litoria wilcoxii	Mixophyes fasciolatus	Mixophyes iteratus	Uperolea laevigata	Rhinella marina (exotic)
Blackfellow Creek	Barker's dams	27-Oct-03			10		3					1			1	
Blackfellow Creek	Barker's property, Jorgensen Road	27-Oct-03	20	1					12							
Blackfellow Creek	Poulsen Road	1-Nov-05	1		10			1		1				6		
Blackfellow Creek	Skyring Creek Road	1-Nov-05	3		6	2		1	1	2	1			3		
Blackfellow Creek	Barker's dams	9-Feb-06			20	1				1						
Blackfellow Creek	Barker's property, Jorgensen Road	9-Feb-06	5		2				10			1	1			1
Blackfellow Creek	Barker's property, Jorgensen Road	9-Feb-06	5		2				9			1	1	1		1
Blackfellow Creek	Anderson's property	17-Feb-06										1				3
Blackfellow Creek	Jorgensen Road	28-Nov-07	3	2					1							
Blackfellow Creek	115 Old Ceylon Road	29-Nov-07	4						11							
Blackfellow Creek	Old Ceylon Road	29-Nov-07	1	1	6											
Black Fellow Creek	Annette House's record from Jorgensen Road just upstream from Barker's	9-Feb-11												1		

Eva Ford, Catchment Officer (Threatened Species Project)
Mary River Catchment Coordinating Committee, PO Box 1027, Gympie, QLD 4570

6. Effects on property Values

Property values
The devaluation effect of broiler farms on neighbouring properties is undeniable – but it varies depending on the proximity and size of the adjoining blocks of land.

The council should consider relevant State legislation, and where applicable in respect of interpretation of that legislation, decided case law and general principles at common law come into decision-making.

Queensland **Planning and Environment Court** judges have found that chicken farms cannot unreasonably degrade the property values of neighbouring land owners:

"I hope it is unnecessary to add that in cases such as this all interested parties must have regard to some obvious matters. First, as dictated by the law and good neighbourliness, the appellants cannot unreasonably degrade the lifestyle and property values of local residents."
(*Murphey versus Beaudesert Shire Council* [2002]; QDC 292; 28 November 2002)

There is evidence from Victoria that land values fall once broiler operations are placed within a community Reference.

7. Financial viability of the proposal

Will the proposal be viable financially?
Without a firm financial basis, the Applicant will be unable to meet his obligations to carry out the odour, dust, noise and water pollution mitigation obligations that would be part of a best-practice broiler growing operation.

The attached spreadsheet is a profit and loss estimate based on projected annual income and expenditure. It shows a potential loss of $1,266,936 at lower estimates of employing 5 people and a loss of $1,696,936 if there are 10 employees as per the Applicant's latest statements.

This is of great concern to those living in the district who will be greatly inconvenienced by this operation and would have no recourse to legal action.

ANNUAL PROJECTED INCOME & EXPENSES

Broiler Farm Proposal, 136 Top Forestry Road, Ridgewood, QLD 4563

Income				Low		High
		1,500,000 Birds @ 0.65 per bird		975,000		975,000
Expenses						
		Wages (? 5 or 10 Employees)		250,000		500,000
		Superannuation		23,000		46,000
		Workcover		8,000		5,000
		Electricity		80,000		100,000
		Rates		50,000		50,000
		Fuel		15,000		15,000
		Other, Inc Repairs & maintenance, Accountancy, legal		60,000		100,000
		Amortisation & Depreciation (average cost of Building & Equipment $6M		300,000		400,000
		Total Expenses		786,000		1,216,000
		Principle & interest (8% P.A. over 10 years, no residual, on $10,000,000 *per annum*		1,455,936		1,455,936
				2,241,936		2,671,936

Note 1: Income is an estimate based on current industry rates as stated here.
Note 2: No amortization of estimated $4,000,000 of improvements has been estimated.
Note 3. (Employment component + $276,000; also several higher Assessments)

Annual Loss with 5 Employees = $1,266,936

Annual Loss with 10 Employees = $1,696, 936