

Appendix 8

SHAWN PAUW
196 SECOND RD
WALKERS FRUIT FARMS
083-264-1881

February 27, 2013

ENVIROKEY MANAGEMENT SERVICES cc
Moses Mathebula

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Dear Moses:

Thank you for affording me the opportunity to give my input as to the Basic Assessment Report in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended, and the Environmental Impact Assessment Regulations, 2010 (Version 1) for the Proposed Chicken Farm at 255 Walkers Fruit Farms.

For the record, I am objecting to the proposed development of a Chicken Farm in the Walkers Fruit Farms area.

I find the Basic Assessment Report (BAR) to be MISLEADING to the I&AP's and A TOTAL LACK OF NECESSARY INFORMATION for any department to make a decision on.

A full EIA needs to be done for this development!

1: Part 6 of Section A clearly states:

6. SITE OR ROUTE PLAN

A detailed site or route (for linear activities) plan(s) must be prepared for each alternative site or alternative activity. It must be attached as Appendix A to this document. The site or route plans must indicate the following:

- the scale of the plan, which must be at least a scale of 1:2000 (scale can not be larger than 1:2000 i.e. scale can not be 1:2500 but could where applicable be 1:1500)
- the property boundaries and numbers of all the properties within 50m of the site;
- the current land use as well as the land use zoning of each of the properties adjoining the site or sites;
- the exact position of each element of the application as well as any other structures on the site;
- the position of services, including electricity supply cables (indicate above or underground), water supply pipelines, boreholes, street lights, sewage pipelines, septic tanks, storm water infrastructure and telecommunication infrastructure;
- walls and fencing including details of the height and construction material;
- servitudes indicating the purpose of the servitude;
- sensitive environmental elements on and within 100m of the site or sites including (but not limited thereto):
 - Rivers and wetlands;
 - the 1:100 and 1:50 year flood line;
 - ridges;
 - cultural and historical features;
 - areas with indigenous vegetation (even if it is degraded or infested with alien species);
- for gentle slopes the 1m contour intervals must be indicated on the plan and whenever the slope of the site exceeds 1:10, the 500mm contours must be indicated on the plan; and

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- the positions from where photographs of the site were taken.
- Where a watercourse is located on the site at least one cross section of the water course must be included (to allow the 32m position from the bank to be clearly indicated)

THERE IS NO APPENDIX A attached to your BAR document for the residents of WFF to see the actual size and extent of the activity in question.

Your Figure 1 is totally MISLEADING and should at least show the correct number of Chicken House that are going to be erected and the size of the Chicken Houses.

7. SITE PHOTOGRAPHS

Colour photographs from the centre of the site must be taken in at least the eight major compass directions with a description of each photograph. Photographs must be attached under the appropriate Appendix. It should be supplemented with additional photographs of relevant features on the site, where applicable.

This has not been done as there should be at least 8 photos in the 8 major compass directions.

8. FACILITY ILLUSTRATION

A detailed illustration of the activity must be provided at a scale of 1:200 for activities that include structures. The illustrations must be to scale and must represent a realistic image of the planned activity. The illustration must give a representative view of the activity. To be attached in the appropriate Appendix.

ALSO NOT DONE!!!

SECTION B

8. LAND USE CHARACTER OF SURROUNDING AREA

WHY ARE THERE NO RESIDENTIAL ACTIVITIES MARKED IN THE SURROUNDING AREA???

SECTION C: PUBLIC PARTICIPATION

3. CONSULTATION WITH OTHER STAKEHOLDERS

Several issues that were raised by other stakeholders have been registered. The residents pointed out that the proposed development will be located in a Conservancy Area. In addition to that, the stakeholders had raised concerns about the following:

- 1.** Safety impacts due to the increased economic activities in the area;
- 2.** Impacts on roads (concerns about traffic volumes and the capacity of current roads to handle / accommodate heavy duty vehicles);
- 3.** Distance of chicken scoops from the property borders;
- 4.** Smell (odour) emanating from chicken broilers and potential diseases that may be associated with chicken broilers.
- 5.** The potential for impacts on water (contamination of underground water resources and the water table); and
- 6.** Waste disposal

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4. GENERAL PUBLIC PARTICIPATION REQUIREMENTS

The Environmental Assessment Practitioner must ensure that the public participation is adequate and must determine whether a public meeting or any other additional measure is appropriate or not based on the particular nature of each case. Special attention should be given to the involvement of local community structures such as Ward Committees and ratepayers associations. Please note that public concerns that emerge at a later stage that should have been addressed may cause the competent authority to withdraw any authorisation it may have issued if it becomes apparent that the public participation process was inadequate.

The practitioner must record all comments and respond to each comment of the public / interested and affected party before the application is submitted. The comments and responses must be captured in a Comments and Responses Report as prescribed in the regulations and be attached to this application.

SECTION D: RESOURCE USE AND PROCESS DETAILS

1. WASTE, EFFLUENT, AND EMISSION MANAGEMENT

The proposed development will also produce waste in the form of, domestic waste, chicken droppings and carcasses. Domestic waste will be collected by the local municipality's service provider for disposal in a permitted landfill site.

A contractor will collect the chicken droppings to make compost off site.

QUESTIONS:

WASTE: OPERATIONAL PHASE

How much chicken droppings (referred to as litter/bedding) (Cubic Meters) are going to be produced by 360 000 chickens over a 6 week period

What size trucks are going to come into the area to collect and remove such bedding and how many trucks per 6 week cycle?— Bedding will only be removed during cleaning of the chicken house at the end of the 6 week cycle!

Is there proof on any contract with someone to collect and remove such waste?

A general rule is that what goes into the mouth will come out the other end! Relative to the amount of food consumed over the 6 week cycle.

What is the expected Mortality rate for 360000 chickens? 3.5 to 4% which according to SAPA is a very desirable rate? As the chicken house gets used and older, will the mortality rate not increase? 12600 – 14400 carcasses?

What will happen to these carcasses? (12600 to 14400 carcasses per 6 weeks) Frequency of transport to remove these carcasses and size of vehicle used?

What amount of airborne particles will be produced when the chicken houses are cleaned? - During loading of the large amounts of bedding produced over the 6 week period.

DOMESTIC SEWERAGE: (Operational stage)

What is a realistic volume of domestic sewerage (Black Water) to be produced on the site? (Taking into consideration that each time a toilet is flushed it uses 10 to 15 litres of water and it is predicted that there will be between 20 and 35 workers on the property daily with 20 of them residing on the property) How can only 1 cubic meter be put on the application?

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Where will this sewerage go to? There is NO Municipal sewerage system in WFF

Note: If the solid waste (construction or operational phases) will not be disposed of in a registered landfill site or be taken up in a municipal waste stream, the applicant should consult with the competent authority to determine whether it is necessary to change to an application for scoping and EIA.

EFFLUENT:

How will the Chicken houses be washed out and what amount (Volume) of water will be used to wash such houses out?

How frequent will these houses be washed out?

How will the vehicles entering the property be cleaned so as not to bring possible diseases onto the property that could destroy the whole "Batch" of chickens?

Where will all this water run off to? –Septic tank as stated further in the application?

Will the activity produce any effluent that will be treated and/or disposed of on site?
If yes, what estimated quantity will be produced per month?

YES
N/A ???

2. WATER USE

Borehole certified to pump 5000 litres per hour.

How much water does a chicken consume over a 6 week period?

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Figure1:

Drinking system and water consumption.												
Information taken out of the ROSS Broiler Management Manual.												
Typical Water Consumption by Broilers at 21 deg C in litres per 1,000 Birds per Day.												
Age of Birds (Days)	Nipple drinkers without cups			Nipple drinkers with cups			Bell Drinkers			X 1000 Birds		
	M	F	AH	M	F	AH	M	F	AH	120	345	360
7	62	58	61	66	61	65	70	65	68	7320	21045	21960
14	112	101	106	119	107	112	126	113	119	12720	36570	38160
21	181	162	171	192	172	182	203	182	193	20520	58995	61560
28	251	224	237	267	238	252	283	252	266	28440	81765	85320
35	309	278	293	328	296	311	347	313	329	35160	101085	105480
42	350	320	336	372	340	357	394	360	378	40320	115920	120960
49	376	349	363	400	371	386	423	392	409			

From the above table it can roughly be calculated that the 6 week cycle consumption for the 345000 live birds will be approximately 2,000,000 Litres of water.

This is excluding any water usage for cleaning or any other activity where water is used on the property!

2,000,000 Litres per 42 days equates to an average of 47619 litres of water consumed per day!!!

Typical Water Consumption by Broilers at 21deg C in Litres per 1000 Chickens per day. Note that 345 is where the 4% mortality rate has been taken into consideration!

By these figures received from The ROSS BROILER MANAGEMENT MANUAL you can see that the water consumption for the birds is going to be way over the 225000 (or as shown elsewhere 750000) litres per month as in the BAR and WUL!

This is excluding the water to be used to wash out the Chicken Houses and Vehicles entering the property and for any other use on the property not mentioned here.

Will the extraction of this amount of water not have any effect on the existing water table?

Will the water run off not contaminate the ground water and if entering the perennial stream not contaminate the stream?

3. POWER SUPPLY AND 4. ENERGY EFFICIENCY

What is the expected Kw/hr usage?

How many Kw will be used on a daily basis and cumulative over the 6 week period? (Bearing in mind that electricity will be used to heat as well as cool the chicken houses!)

The whole system is proposed to be automated and thus be computerised with electronic drives for feeding purposes too.

SECTION E: IMPACT ASSESSMENT

Summaries of response from the practitioner to the issues raised by the I&AP's

I find the response from the practitioner to be very vague and unacceptable as to the issues raised by the I&AP's! Evidently I can ask whether the practitioner actually did any investigation into the proposed activities that contribute to the running of a chicken farm?

Safety- CRIME:

There will be more people walking through our streets saying that they are going to look for work at the Chicken Farm. There will always be a group of people waiting outside plot 255 waiting for their chance to be employed as an ad hoc worker and the trend is for criminals to mix in with these workers so as to move un-suspiciously through our area of residence!

(This happens every day at the Harvest Fresh packing facility!)

There will be "visitors" to the staff that will reside on the property and the criminal element will use this as an excuse when caught loitering around in the area at night.

As for the "Hostel" to accommodate the 20 workers who will reside on the property, has any application been put in to the Council for the housing of such workers on the property?

Heavy Vehicles moving on our roads as a danger to other road users:

Our road infrastructure is small and narrow!

The great increase in large vehicles (Trucks) moving up and down our roads will make it difficult for residents from the area to pass vehicles and will have to move over to make space for the oncoming trucks!

IMPACT ON OUR ROADS:

How can it be said that there are very few smallholdings on the way to the proposed site?

Has the Practitioner counted the properties and made note of how many of them have residents living on them?

It is said in the response from the practitioner that there will be a slight increase in traffic volumes during the construction and operational phases of the proposed project--- This response is totally unacceptable! Do some homework and calculate how many trucks will be going to the chicken farm on a daily basis!

How many cubic meters of "litter" need to be transported into the farm to place on the floor at the beginning of each 6 week cycle? – 120m x 15m @ 80mm thick = 144 cubic meters of "sawdust" per chicken house!

How will this be transported to the proposed site?

How many trucks and what size trucks will bring the 360 000 chickens into the area?

How much food is going to be consumed by these chickens over the cycle and how many trucks and their size will be used to transport this amount of food into the area for the chickens? I.e.: How many loads a day?

(Between 576 tons to 1640 tons of food consumed by chickens over the 6 week cycle)

(There are various types of feed for different stages of growth)

(Average Feed truck is 14 tons and would mean at least 42 trucks to bring 576 tons and 118 trucks to bring in 1640 tons of food into the area.)

(Truck size is limited to 5 tons on our roads in WFF)

How much bedding (litter/Droppings) is going to be produced over the 6 week period and what size trucks are going to remove such litter?

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(Approximately 50 cubic meters of litter per chicken house which equates to 300 cubic meters of litter if there are 6 chicken houses.)

(This will only be cleaned out at the end of each 6 week cycle and would leave approximately 7 days to remove such litter- i.e.: 43 cubic meters of litter per day for a week!)

Will the machinery used to grade out the chicken houses and load the bedding onto trucks be brought in by the contractor and then removed once such bedding has been loaded and removed from site?- Again heavy vehicles added to the traffic in the area.

With a mortality rate of 3.5 to 4% it equates to 14400 dead chickens over the 6 week cycle. What size vehicle will remove the "drums" used to hold the dead birds and how often will the vehicle come collect the drums?

How many and what size trucks will come on day 42(6 weeks) to collect the chickens and take them to be slaughtered?

(345000 chickens at 1.8kg equates to 621tons of chickens to be moved on one day)

(345000 chickens at 2.2 kg equates to 759 tons of chickens- depending on the slaughter weight!)

What is the general process and procedure that chicken farms follow on the day that the birds get collected? From what time in the morning? How much noise is generated? How much dust is generated?

Where is the slaughtering facility located?

Distance of chicken houses from the property borders-

With the Chicken houses each being 120M x 15M in size and an unknown distance between the houses and the lack of a detailed site plan as stipulated in Section A point 6 and only given a figure of 6.5 to 7ha being used for the proposed chicken farm, I think that a measured answer would have been better here so as to let I&AP's get a better picture of the extent of the buildings.

Smell (odour) and diseases-

The Chicken houses will only be cleaned after every 6 week cycle! This is more than enough time for smells to be coming from such chicken houses.

There will be a great amount of ammonia concentrate in the air and being exhausted from each chicken house.

There will be plagues of flies as the bedding (droppings/litter) can only be removed and cleaned once the birds have been taken away to the slaughter facility.

The cooler air at night will let the smells settle in the valley and bring great discomfort to the residents of WFF!

There will be a drastic increase in the rat population in the area and the constant use of poisons to control the rat population will be detrimental to the area.

It is understood that there will be a very strict bio security program and that this program will contribute to the increase in water usage and such water will then be "diverted to a septic tank".

Vaccinations are given to the chicks through the water system and then the water system is purged to clean it out and excess water with the vaccination will be sent to the septic tank too!

How big is this tank proposed to be and where is it going to be installed on the site? (Measurements please)

There will be an accumulated disease factor as each and every 6 weeks goes by with the mortality rate increasing as well as the smells getting stronger all the time. This is the trend of chicken houses across the country!

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Potential impacts on water –

As per calculations of the amount of water consumed per 1000 birds at various ages, I think it is safe to say that removal of such large amounts of water on a continuous basis will be detrimental to the water table in the area and to existing borehole users.

Here again I ask what volume of water will be used to wash the chicken houses out on the 6 weekly cycle basis and what size septic tank is proposed to be installed?

Will the effluent from the cleaning of chicken house be treated on site? If so, how? If not, how will it be disposed of?

Has the borehole water been tested as recommended by the South African Poultry Association (SAPA) to see that it is fit for the growing chickens or could it add to the mortality rate and digestive diseases?

What infrastructure will be installed for the intended housing unit for the family and for the Hostel to accommodate the workers?—regarding the sewerage and possible contamination of underground water.

Waste disposal-

Again we come back to the question of how much bedding (droppings) are expected to be produced and how will these be disposed of? Cubic meters or tons produced?

What size trucks will be used to remove the bedding?

CONCLUSION from my side:

I have just touched on the expected traffic increase and water usage from the borehole.

As you can see from the logistics in running a chicken farm and all the goods that need to be transported to and from the chicken farm, that there will be a very high impact on the traffic in the WFF area.

The amounts of feed, bedding, litter, carcasses, chickens coming in and chickens going out will all be transported in large trucks.

It is just not feasible to try and use 5 ton trucks and bakkies to try and transport all of these things.

Not only will it increase the traffic even more but would be a substantial increase on transport costs that would ultimately increase the production cost of the birds per kg.

The water consumption by the chickens and the running of the chicken farm will be detrimental to the water table of the area and there is a great possibility that such water could get contaminated from the chicken farm.

The BAR needs to have the correct information in it so that the correct decision can be made as to this whole proposal.

There needs to be a full Scoping report and full EIA done as to the complete proposed chicken farm and each area of concern needs to be answered in detail and to the satisfaction of the I&AP's!

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Regards

Shawn Pauw

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ROSS 308 Broiler: Performance Objectives								
As-Hatched Performance			Per Bird!					
Day	Body Weight (g)	Daily gain (g)	Av. Daily gain/week (g)	Daily intake (g)	Cumulative intake (g)	FCR	120000	345000
0	42						kg per day	
1	56	14		13	13		1560	4485
2	72	15		17	30		2040	5865
3	89	18		20	50		2400	6900
4	109	20		23	73		8760	7935
5	132	23		27	100		3240	9315
6	157	25		31	131		3720	10695
7	185	28	20	35	166		4200	12075
8	217	31		39	204		4680	13455
9	251	35		43	247		5160	14835
10	289	38		48	295		5760	16560
11	330	41		53	348		6360	18285
12	375	44		58	406		6960	20010
13	422	48		63	469		7560	21735
14	473	51	41	69	538		8280	23805
15	527	54		74	612		8880	25530
16	585	57		80	692		9600	27600
17	645	60		86	778		10320	29670
18	709	63		92	870		11040	31740
19	775	66		98	968		11760	33810
20	844	69		104	1072		12480	35880
21	916	72	63	110	1182		13200	37950
22	990	74		116	1298		13920	40020
23	1066	77		122	1421		14640	42090
24	1145	79		128	1549		15360	44160
25	1226	81		134	1684		16080	46230
26	1309	83		140	1824		16800	48300
27	1393	85		146	1970		17520	50370
28	1479	86	81	152	2122		18240	52440
29	1567	88		157	2279		18840	54165
30	1656	89		163	2442		19560	56235
31	1746	90		168	2610		20160	57960
32	1836	91		173	2783		20760	59685
33	1928	92		178	2961		21360	61410
34	2020	92		183	3144		21960	63135
35	2113	93	91	187	3331		22440	64515
36	2207	93		192	3523		23040	66240
37	2300	94		196	3719		23520	67620
38	2394	94		200	3919		24000	69000
39	2488	94		204	4123		24480	70380
40	2581	94		208	4331		24960	71760
41	2675	94		211	4542		25320	72795
42	2768	93	94	215	4757		25800	74175
TOTAL:							576720	1640820

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