

## Appendix 7

### COMMENTS ON PROPOSED DEVELOPMENT OF BROILER FARM IN WALKERS FRUIT FARMS

The following figures are of relevance to the proposed development of a broiler farm. My figures and comments are based on six houses, 115 m X 12 m = 1800m<sup>2</sup>.

#### **FEED AND WATER**

The number of broilers that can be housed depends on the type of ventilation. With mechanical ventilation and cooling pads, one can house 20 birds/m<sup>2</sup> or 15 birds/m<sup>2</sup> in naturally ventilated houses. (ie. houses with curtains that can be raised or lowered depending on the weather.)

For six mechanically ventilated houses with 36000 birds each they will consume 648 tons of feed and 1296 m<sup>3</sup> of water per cycle of 6 weeks. With 15 birds/m<sup>2</sup> the total feed consumption will be 486 tons of feed and 972 m<sup>3</sup> of water per cycle.

Feed trucks are built to carry either 12, 24 or 30 tonnes of feed. Take on average that deliveries will 24 tonnes which means 27 loads during a six week cycle. For the lesser number of birds it amounts to 20 loads per six week cycle. The figures on number of truck loads is an underestimate because smaller loads for pre-starter and starter diets will have to be transported in the smaller trucks.

Water consumption figures are estimated to amount to 1296 and 972 m<sup>3</sup> for mechanically ventilated buildings and naturally ventilated houses respectively. On page 15 of the Basic Assessment Report Document, the estimated water usage is 225 000 m<sup>3</sup>. This is far below water consumption figures based on feed intake values of the birds, namely 648 or 486 tons per cycle, water intake by broilers is twice the feed intake figure at normal environmental temperatures.

#### **BUILDINGS**

On page 9 of the report it is mentioned that semi-permanent buildings that will be easy to remove, will be erected.

This statement makes no sense. Modern poultry houses are solid and well constructed to ensure a comfortable environment for the broilers, ceilings are most important to prevent condensation of moisture against the iron roofs and walls must have smooth finishings to ensure easy and proper cleaning and disinfection after harvesting a crop of broilers.

#### **JOB CREATION**

On page 10 it is mentioned that **30** new employment opportunities will be created. The type of feeding and watering facilities are not mentioned but with modern poultry production practices these are automated equipment to ensure optimum conditions for the birds. One trained houseman is able to look after more than 30 000 birds and labour cost with five persons will most certainly make the envisaged venture not economically viable. It is unfortunately my impression that not enough thinking and planning has gone into the operations and running of a modern broiler farm.

#### **SEWAGE**

On page 15 the first question reads: "Will the activity produce effluent, other than normal sewage that will be disposed of in municipal sewage system?" The answer provided is " NO".

This answer cannot be correct. After the depopulation of the houses and the removal of the bedding material, buildings have to be washed inside and outside with high pressure spray guns with water containing a detergent and a disinfectant. Equipment like feeder and water lines have also to be taken apart and washed. Normally each house would have a concrete apron surrounding the whole building and the wash water from the building as well as from the wash-bay is collected in an underground sewer. This water can't be disposed of in the municipal sewage system.

### **HEATING EQUIPMENT**

On page 16 it is not stated how many 250 Watt lamps are to be installed.

Electric heaters are not only impractical because they cannot be washed and cleaned properly. Apart from this the running costs to heat the house and floor and bedding to 28 °C and have a house temperature of 33 °C for the first two days will cost a fortune. The use of electric lamps is good enough for small scale heating purposes, say for 100 – 200 birds in a small room.

Presently gas or coal-fired burners with water radiators are used on all commercial broiler farms.

### **TRAFFIC IMPACT**

On page 19, in the continuation of paragraph 3, regarding the impact the roads, it is stated: *“Added to that, it is anticipated that the proposed development will result in slight increase in traffic volumes in the area during construction and operational phases of the proposed project. The operation will be based on a 6-week cycle. A contractor will deliver live chicks to the facility once per six week cycle. It is envisaged that the collection of the chickens after they have reached the desired weight will be combined with deliveries at the end of the first cycle. This means that the same vehicle used to deliver chicken will be used to collect chickens from the operation at the same day, thus reducing traffic flows as a result of the proposed activity”*.

The absurdity of this proposal in the previous paragraph is beyond comprehension. To make a delivery of that number of day-old chickens (6 X 27000 or 6 X 36000) once in a six week cycle is simply not in the capability of the largest of the broiler producers in this country. Under ideal conditions six houses will be stocked over a period of 10 - 12 days as chick trucks would normally carry between 25 000 to 30 000 day-old chickens. An equally serious blunder is the assumption that the same vehicle in which day-old chickens have been transported can collect the broilers at slaughter age. A dedicated airconditioned chick truck is used for transporting day-old chickens. These trucks can carry up to 25 000 day-old chickens. The trucks for loading the broilers can only take 6336 broilers per load (or 10 000 if it is the so-called interlink with a trailer). The risk of contaminating day-old chickens with disease causing organisms is so large that day-old chick trucks are not even used to carry hatching eggs to hatcheries.

It is indeed regrettable that the writer of the Basic Assessment Report (Regulation 22 (1)) has gone to such lengths to mislead the authorities on the traffic impact in order to approve the project.

### **NOXIOUS GASES**

On page 18 paragraph 5: **Smell (odour) and diseases**. *“The cages/scoops will be cleaned on a regular basis to avoid smells that can bother neighbours of the proposed development”*.

This is also a nonsensical statement. The broiler houses cannot be cleaned on a regular basis during the growth period of five weeks. The dust on fans or curtains can indeed be brushed off but the

floors with bedding material, wood-shavings is used to absorb moisture excreted in the urine of the chickens, is taken out at the end of a cycle.

During winter or in rainy weather it is difficult to have a low moisture content, 25%, in the bedding; higher levels result in ammonia production due to microbial action on the uric acid excreted by the chickens. This would normally happen towards the end of the growing period when the chickens are close to marketing weight. It is virtually impossible to rear broilers without a certain amount of dust and chicken odours polluting the air.

A handwritten signature in black ink, appearing to read 'JP Hayes', with a stylized, cursive script.

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1<sup>st</sup> March 2013