

Technical Briefing Note

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Lockyer Valley Regional Council Risk Mitigation Procedure

Lockyer Valley Regional Council (LVRC) and the Laidley Saleyard stakeholders have identified numerous operational inefficiencies and capital improvements required at the Laidley Saleyards. The Laidley Saleyards is the only operating saleyards for livestock producers in the region. It is an ageing facility that is located on the outskirts of the Laidley Township with proximity to the Laidley Rosewood Road and residential housing. The facility was officially opened on the 9th June 1972, making the site eligible for heritage listing as of the 9th June 2022.

An analysis and audit of the risks at the site was undertaken, from that the following was developed:

- Risk assessment;
- Risk priority matrix;
- Recommendations of aspects to be assigned to the site user; and,
- High level cost breakdown for the capital improvements to address compliance.

The intention is to provide a way forward where the Laidley Saleyards can operate efficiently and cost effectively, while meeting regulatory legislation. The site requires a number of issues to be mitigated to become compliant. Those risks have been assessed, prioritised and valued within this report.

1. Risk Assessment

The risk assessment undertaken for the Laidley Saleyards was derived from site visits and multiple environmental and structural assessment / monitoring reports completed for the site.

1.1 Overview of Compliance Issues

The Laidley Saleyards are currently in breach of multiple regulatory standards, exposing the LVRC to significant legal risks. The identified breaches span several critical areas including:

- Environmental Protection;
- Workplace Health and Safety (WHS);
- Animal Welfare; and,
- Other Relevant Legislation.

These breaches are compounded by violations of specific provisions in the Environmental Protection Act 1994 (EP Act) (Environmental Protection Act 1994, 2022), the Mode Code of Practice (Taylor, 2015) and the Animal Welfare Standards (Animal Health Australia, 2016).

1.2 Breaches and Potential Legal Implications

1.2.1 Environmental Protection Act 1994

Section 440ZG and Section 442: These sections outline environmental protection requirements related to waste management, pollution control, and land degradation. The saleyards have been found to be in contravention of these sections, which could result in enforcement actions, fines, or further legal proceedings. Potential violations could involve:

- Inadequate waste disposal and management practices;
- Pollution of surrounding ecosystems from runoff or contaminated waters from the site; and,
- Failure to conduct necessary environmental assessments or carry out mitigation strategies.

There is a high risk of legal action for non-compliance, including possible fines, remedial orders, or damage to reputation. LVRC could face significant liability if environmental damage is proven, particularly if the saleyards are found to be a contributing factor to broader environmental degradation.

1.2.2 Mode Code of Practice

The Model Code of Practice outlines minimum standards for the operation of saleyards, ensuring animal handling and welfare is maintained at acceptable levels. Breaches may include:

- Inadequate facilities for holding, handling, or transporting livestock;
- Failure to provide safe and humane conditions for animals, leading to distress or injury; and,
- Insufficient oversight of animal welfare during auctions or movements.

The legal implications for breaches to the Model Code of Practice include potential prosecution under animal welfare laws if it is found that the facilities or practices at the saleyards result in harm or distress to the animals. Civil lawsuits or claims for damages could arise from animal welfare organizations or individuals.

1.2.3 Animal Welfare Standards (Animal Health Australia, 2016)

The Animal Welfare Standards set out specific requirements for the care and management of livestock. If the saleyards fail to meet these standards, it may lead to:

- Stress, injury, or death of animals due to improper facilities or practices; and,
- Failure to implement appropriate biosecurity measures to protect animal health.

Breaches of animal welfare regulations could lead to criminal charges, fines, or the suspension of operations at the site. Liability for any animal welfare breaches could result in both regulatory penalties and civil litigation from affected parties.

1.3 Risk of Litigation and Review of Current Status

Given the multiple breaches across these areas, the risk of litigation is significant. LVRC faces potential legal actions from regulatory bodies such as the Queensland Department of Environment and Science (DES), which may issue fines or orders for corrective actions. Animal welfare organizations or advocacy groups may pursue legal claims based on breaches of animal welfare standards while environmental groups or local community members may seek compensation for any environmental damage caused by the operation of the saleyards. Workers or employees who lodge complaints regarding unsafe working conditions can lead to potential claims under workplace health and safety legislation.

Upon review of the site audit and multiple site visits it is recommended that LVRC implement the following:

- Environmental Remediation Plan: Develop and implement a strategy for addressing any environmental issues, including waste management and pollution control measures.
- Animal Welfare Improvement: Upgrade facilities to meet the requirements set out in the Mode Code of Practice and Animal Welfare Standards.

- **Workplace Health and Safety Improvements:** Provide mitigation of the site's health and safety issues to ensure compliance with relevant regulations.
- **Staff Training and Education:** Provide ongoing training for all staff on relevant compliance standards to ensure a culture of safety and responsibility.

The site requires immediate works to halt compliance action. The review of the Site Audit generated the immediate corrective actions required to mitigate the potential for legal action and regulatory penalties. This report outlines the critical issues identified, non-critical actions, required mitigation actions, and steps to be taken to bring the site into compliance as quickly as possible.

2. Rationales

The rationales behind the development of the risk assessment and work plan include works which are required to be split into critical and non-critical elements to address fundamental compliance issues in its immediacy.

2.1 Critical – fundamental compliance

These are tasks or operations that must be performed to ensure compliance with legislative requirements and governing body regulations.

It is essential prior to commencing any works over the site, that initial works take place. This includes site survey, detailed engineering design, soil testing (if required) and fencing (barrier to limit visibility). This ensures the works that are undertaken in future is done accurately with a front end engineering approach that minimises risks and unforeseen issues.

2.1.1 Environmental Compliance

Critical issues to be addressed:

- **Effluent Disposal:** There are no effluent controls in place to manage the removal or contamination into the stormwater and local creek. This is non-compliant with the current EPA regulations around effluent controls – Section 321 of the Environmental Protection Act 1994.
- **Wastewater Runoff:** There is minimal wastewater controls and uncontrolled waste releases are occurring to the receiving environment. EPA regulations around effluent controls – Section 321 of the Environmental Protection Act 1994.
- **Stormwater Runoff:** There is no stormwater control in the facility.
- **Dip Drainage Pens:** The drainage pens do not have sufficient controls in place. Limited area and poorly define drainage. Leakage of chemicals could occur to surface waters via rainfall-runoff. In breach of Environmental Protection Act 1994.
- **Chemical Storage:** Chemical storage shed was not locked. Chemical labels were missing or hand written. Some items were in poor condition. The area was not clean and tidy and free from hazards. No Safety Data Sheets are maintained in the chemical storage area. No spill kits are available in the chemical shed. No portable spill kits are available for other areas. The shed is not bunded, which does not meet current regulations. Chemicals are not disposed of properly. No dispensary records noted for veterinary chemicals/materials. No secure storage for vet prescription items is available at the site.

Immediate Remediation Measures:

- **Effluent Disposal and Wastewater Runoff:** A holding pond for contaminated runoff to be installed. Proper drainage from all areas to be directed to the holding pond. Irrigation system to be installed to irrigate waters from the holding pond to a Lot that is not used. Bunds and wastewater controls require installing and directing contaminated runoff to the holding pond.
- **Stormwater:** Stormwater drains/tanks to be installed, drains will be directed to stormwater pits for each Lot.

- **Dip Drainage Pens:** Remediation of drainage pens, roof structure to be erected to ensure no diluting of chemicals and no uncontrolled runoff occurs.

3.1.2 Health and Safety

Health and safety compliance includes tasks necessary to safeguard the well-being of staff, animals, and the general public. This includes compliance with health and safety laws, such as those related to workplace conditions, personal protective equipment (PPE), safe handling of hazardous materials, emergency preparedness, and chemical storage. Ensuring the workplace adheres to standards set by governing bodies, such as, Workplace Health and Safety Queensland (Work Health and Safety Act 2011 (Qld)).

Critical issues to be addressed:

- **Emergency evacuation:** There is currently no emergency evacuation area in place or site maps to ensure in an event, that all site users are aware of the safe muster point.
- **Pavilion - Human use compliance:** No safe access (e.g. compliant stairs and rails), No waiver for entry, no fire systems in place, no agent / auctioneer podium access etc. Injury to a user and claim against the site owner.
- **Signage:** There is currently no signage at the entrance to the facility. This allows anyone to enter and does not meet requirements of a safe site. No PPE enforced at facility. Any injuries sustained under these circumstances puts LVRC at risk.
- **Vehicles load / unload; uncontrolled parking:** Currently there are no site vehicle controls. There is direct Heavy Vehicle (HV) and Light Vehicle (LV) interactions, causing log jams and accidents, human injury, vehicle damage and animal injury.
- **Records:** The following records were not made available during the audit process: Training records; Standard Operating Procedures; Safe Work Method Statements; Operator licenses or tickets; Operator competencies; Equipment maintenance schedule; Destruction equipment storage and maintenance; Authorised personnel lists; None of the staff have Animal Welfare Officer Accreditation (AWOA).
- **Security:** No secure entry into the facility was noted. No livestock security is in place for the facility. Pens are very easily accessible, with no locks installed. Any person has access to the facility at any time.

Immediate Remediation Measures:

- **Emergency Evacuation:** An Emergency Evacuation Point is required to be nominated. Emergency evacuation plans are required to be erected around the site so that all users are aware of where to go in an event. First Aid stations / Fire Extinguisher signs and apparatus required are also required to be implemented around the site in critical locations.
- **Pavilion - Human use compliance:** There are fixes that are required to be implemented to make the building compliant (to a level). Provide Safe Access (Podium, Stairs, rails, etc.), ensure a waiver is sighted and signed prior to entry, install fire systems, implement structural amendments (seating structure, close in spacing in handrails, etc.), install a new front door, with signage to state the risks associated in entering the building.
- **Signage:** Signage is required to be erected at the entrance to the facility, prohibiting any general public, activists, etc. This ensures only persons attending the sale or working the sale are accessing the site. This gives the site operator the right to remove anyone who does not meet those requirements. It also gives the site operator control to remove persons not adhering to the legislative requirements of site entry (PPE) stated on the signs.
- **Vehicles - load / unload; uncontrolled parking:** Heavy Vehicle (HV) separation from Light Vehicles (LV). This requires measures to be implemented at the Loading Area, the area will need to be graded and gravelled, with Signage, line marking, turn around area with appropriate signage to restrict access/parking of LV.
- **Records:** Registers and records for operations must be implemented and maintained. To be checked prior and after each sale. Records must be obtained and held on site by the site manager to be produced at any time. Obtain (AWOA) for operating staff.
- **Security:** Barrier fencing/Signage to be erected around the facility/entrance. This allows “trespassing” laws to be upheld.

2.1.2 Animal Welfare

Critical issues to be addressed:

- **Drainage/Surface Base:** Pens have inadequate drainage for stormwater and waste water. Both flow from pen to pen with no controls in place. Effluent is pooling in multiple areas across the saleyards.
- **Yard Improvements:** The facility is dated and has not been maintained to a safe standard. There are protrusions, crush points, gate chains, overhead clearance issues for both operators and animals. The watering points for the animals at the facility are not to standard; the troughs are broken and create a point of possible injury for the animals. The waterlines that deliver water to the troughs are not protected by a heat resistant coating and do not deliver safe temperature water for the animals.
- **Surface Base:** The surface of the saleyards is a mix between blue stone road base, dirt both compacted/loose and concrete. Soft stand floor type within the pens/sale pavilion, not maintained. Erosion present around post bases causing trip hazards throughout the yards and loading / unloading ramps. Concrete has been used in various areas of the yards. Concrete ramps have been used at these entry and exit points. Compliant, if maintained.
- **Livestock Processing:** Cattle processing is completed through the cattle crush at the entrance to the dip; the pen configuration does not allow safe flow of cattle from the holding pens after being unloaded into the cattle crush holding yard. The gate used to access the holding pen is dangerous with protrusions.
- **Livestock Receivals:** Cattle processing is completed through the cattle crush at the entrance to the dip. Handling facilities are very limited. Protrusions. No vet withholding / quarantine pens. Large animal - human conflict and injury.

Immediate Remediation Measures:

- **Drainage/Surface Base:** Require reshaping of the foundations with a drain at the rear to be directed to the Holding Pond.
- **Yard Improvements:** Maintenance/remediation measures are required to ensure the yards are compliant. All protrusions, crush points, gate chains, overhead clearances, troughs, and waterlines require remediation measures to address all outstanding issues.
- **Surface Base:** A maintenance plan of the facilities is required to be drafted and implemented. A register for the maintenance should be held by the operator and sequential inspections of the surface areas, erosion points, etc. be carried out to ensure the safety of the users / animals.
- **Livestock Processing:** A new gate to access the holding yard is required. Appropriate PPE for the horse rider that moves the stock is required to be enforced. There are crush points for the horse and rider. These need to be identified and mitigated.
- **Livestock Receivals:** Improve by modification, rearrangement of yards, laneways, etc.

2.2 Non critical – to be implemented over time

These are tasks or activities that are important but do not have an immediate impact on compliance or regulatory requirements. They are essential for overall operational effectiveness but do not directly affect compliance status or legal adherence in the short term.

Non-critical compliance measures at a saleyard are those practices or areas where the risks of non-compliance are relatively low and would not immediately lead to significant legal, safety, or environmental consequences. However, these issues should still be addressed in a timely manner to maintain overall operational efficiency, avoid regulatory scrutiny, and ensure that all aspects of the operation are continuously improving.

Addressing these non-critical issues is part of maintaining a responsible, proactive, and compliant saleyard, and should never be entirely neglected. It's essential to track these measures and address them as part of a broader compliance and operational improvement strategy.

Non-critical tasks include:

- **Management Plans:** the facility requires management plans to be drafted and implemented to ensure continued compliance is maintained around the site. These include:
 - Biosecurity Management Plan (BMP): crucial for preventing the spread of diseases and ensuring that animals remain healthy while at the saleyard.
 - Workplace Health and Safety Management Plan (WHSMP): outlines the actions required to ensure a safe working environment for all employees and contractors at the saleyard.
 - Environmental Management Plan (EMP): ensures that all environmental aspects of the saleyard operation are monitored and managed to minimize negative impacts on the local environment.
 - Waste Management Plan: to ensure proper disposal, recycling, or treatment of waste materials, minimizing environmental impact.
- **Site Signage:** Some site signage isn't an immediate necessity. Signage around the site can be provided in a staggered implementation. The critical signage will already be in place at the entrance of the site and meets legislative requirements.
- **Regulatory Updates:** Delays in incorporating new regulatory changes into internal procedures or systems (e.g., updates to waste management guidelines) that do not cause direct harm if still generally compliant.
- **Policy Reviews:** Slight delays in reviewing and revising health and safety policies or training manuals.
- **Pen Size or Setup:** Slightly underutilised pens that technically meet minimum standards but could be more optimized for animal comfort (e.g., more room per animal, better bedding).
- **Animal Handling Procedures:** Minor deviations from ideal handling practices, such as a slight delay in providing water to animals, which might not have a significant welfare impact if resolved promptly.
- **Environmental Enrichment:** Small improvements could be made in providing additional environmental enrichment for animals (e.g., shade), but the animals are not under significant stress.
- **Minor Wear and Tear on Equipment:** Small cracks in non-essential equipment or slight corrosion on gates or rails, as long as they don't compromise the immediate safety of workers or animals.
- **Non-Hazardous Infrastructure:** General building maintenance, such as painting or minor cosmetic repairs to the facility (e.g., cracks in walls that do not affect structural integrity).
- **Minor Waste Disposal Delays:** Temporary delays in waste collection or disposal that don't lead to significant environmental harm, such as waiting a few extra hours for scheduled pick-up.
- **Air Quality Compliance:** Minor, non-repetitive dust accumulation in areas that are not adjacent to sensitive zones or are controlled through local dust suppression methods.

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Addressing these non-critical issues is part of maintaining a responsible, proactive, and compliant saleyard, and should never be entirely neglected. It's essential to track these measures and address them as part of a broader compliance and operational improvement strategy.

3.3 Work Split

The works are proposed to be split into manageable budget increments to facilitate LVRC to engage with contractors in an efficient way (under 200,000 requires 3 quotes prior to contracting the work, anything over requires a tender to be lodged) while managing the overhead expenditure.

The work breakdown structure (WBS) for the project could be divided into core work areas that correspond to the compliance improvements needed at the saleyard. Noting a first priority if critical compliance and immediate health and safety. Core work areas include:

- **Scope of Work:** Immediate environmental compliance actions (e.g., stormwater runoff management, waste disposal upgrades). Workplace Health and Safety (WHS) improvements, including the installation of safety barriers, PPE provision, and minor repairs to critical equipment. Emergency procedures, including signage installation and emergency evacuation route upgrades.
- **Budget Consideration:** This phase will be the most cost-intensive due to the need for immediate intervention in critical compliance areas. It will focus on areas that are high-risk and have the greatest chance of leading to legal action or regulatory fines if left unaddressed.
- **Engagement with Contractors:** Engage contractors for urgent works, ensuring compliance is restored as quickly as possible. This phase could involve multiple smaller contracts, such as for waste management services, stormwater system repairs, and safety equipment installations.
- **Budget Allocation:** Allocate a larger portion of the overall budget for this phase to cover immediate risks and prevent potential penalties. Works have been line itemed within a cost breakdown spreadsheet to outline the required year of completion and commitment to budget.

Breaking down the works into manageable budget increments will help LVRC effectively manage costs and reduce financial risks while ensuring full compliance with environmental, health, safety, and animal welfare regulations. Each phase should be carefully planned, with clear deliverables and contractor engagement strategies, to ensure the project progresses smoothly and within budget.

By focusing on high-priority compliance areas first and spreading costs over time, LVRC can maintain operational efficiency, ensure legal compliance, and create long-term sustainability.

2.3 External Project Manager

It is prudent to engage an external Project Manager (PM) to oversee the work undertaken over the site. Enlisting a professional outside of the interested parties to the saleyard allows for an unimpeachable process that operates efficiently and stays to budget and timeframes. An external PM brings several key benefits to a project, including objective decision-making free from organizational politics, neutrality in resolving conflicts, and proactive risk management to prevent delays or cost overruns. Their specialized expertise, particularly in agriculture, livestock, or environmental sectors, enables them to handle specific challenges such as animal welfare, waste disposal, and regulatory compliance. The PM will closely monitor the project's budget and resource allocation; ensuring financial constraints are met, while also overseeing contractor performance and adherence to the scope. Regular stakeholder engagement and transparent reporting to LVRC will ensure informed decision-making, while the PM ensures compliance with relevant regulations like the Environmental Protection Act and Animal Welfare Standards.

Involving an external professional also fosters transparency and creates trust with stakeholders, as they know that an independent party is overseeing the work, preventing potential conflicts of interest and ensuring the process is executed to the highest standards. Overall, the external Project Manager is a key asset to ensure that the saleyard improvements are delivered successfully, protecting LVRC from potential financial, legal, and operational risks.

3. Works Schedule and Budget

The works schedule should provide a clear timeline for the project, broken down by phases and milestones. The schedule will ensure that each key component of the work is completed on time and within the required regulatory standards. The budget is a critical component that ensures the project can be completed without overrun. The budget will be split by phases/years, with costs allocated for labour, materials, permits, and contingencies. Below is a breakdown of the critical compliance budget.

Priority	Project	Tasks	Act / Regulator	1	2	3	4	Year	Total Cost
1	Project Manager	Overseeing works across the site	External Project Manager of all works	\$16,258	\$11,595	\$13,050	\$11,857	1,2,3,4	\$52,760
2	Initial Site Works	Survey Cadasta Engineering Detailed Engineering Design Fencing (Barrier)		\$70,650	\$0	\$0	\$0	1	\$70,650
3	WW Holding Pond	Earthworks Design Sump Irrigator Chopper Pump and Mainline Reporting (Catchment analysis; Drafting, Design, Engineering)	Ep Act 1994; Chapter 5, [s 273] Environmental Protection (water and wetland biodiversity) Policy 2019 (Department of Environment and Science, 2020) High risk of being fined by DES or by private court cases. (Site earthworks for Holding Pond and Stormwater)	\$324,600	\$65,300	\$0	\$0	1, 2	\$394,900
4	Stormwater	Pipework (roofwater connections) Stormwater Swales (Sheetflow) Tanks (x5 10KL)	Queensland Urban Drainage Manual (IPWEAQ, 2017)	\$0	\$47,500	\$24,000	\$0	2	\$71,500
5	Dip Drainage Pens	Roof Structure Drainage Pens (with pits) Directional Swales	Environmental Protection Act 1994 (Queensland Government, 2022)	\$0	\$54,450	\$27,225	\$27,225	2, 3, 4	\$108,900
6	Pavilion	Safe Access Podium Stairs, rails, etc. Waiver for Entry Fire Systems Structural Amendments (Seating Structure, Close in spacing in handrails, etc.) New Front Door, with Signage	Work Health and Safety Act 2011 (Work Health and Safety Act 2011, 2020)	\$20,500	\$110,000	\$10,000	\$10,000	1, 2, 3, 4	\$153,500
7	Emergency Evacuation Area	Nominated Emergency Evacuation Area and signage First Aid Kits (5) and signage Waiver Template Fire Extinguishers and signage	The Australian Standard AS3745	\$4,114	\$0	\$0	\$0	1	\$4,114
8	Yard Improvement	Protrusions Overheads Configuration Watering Points	Animal Care and Protection Act 2001 (QLD Government, 2021) Model Code of Practice for the Welfare of Animals – Animals at Saleyards (CSIRO, 2002) Model Code of Practice for Livestock Saleyards and Lairages (Taylor, 2015)	\$63,750	\$43,750	\$43,750	\$43,750	1, 2, 3, 4	\$175,000
9	HV Loading/Unloading Areas/Parking	Loading Area (Graded and Gravelled) with Signage Line Marking Turn around area with Signage	Work Health and Safety Act 2011 (Work Health and Safety Act 2011, 2020) and AS2890 Series	\$0	\$0	\$58,135	\$0	3, 4	\$58,135
10	LV Parking	Parking Area Designation Signage (3 signs)	Work Health and Safety Act 2011 (Work Health and Safety Act 2011, 2020) and AS2890 Series	\$3,500	\$0	\$0	\$0	1	\$3,500.00
11	Signage	Signage for the entry Signage around the facility	Work Health and Safety Act 2011 (Work Health and Safety Act 2011, 2020)	\$15,000	\$0	\$0	\$0	1	\$15,000
Total to Reach Compliance				\$518,373	\$332,597	\$176,163	\$92,836		\$1,107,959

Note: Wastewater elements split to be in work packs <\$200,000

4. Conclusion

The Laidley Saleyards, as the only operating saleyard for livestock producers in the Lockyer Valley region, is an essential facility for the local agricultural community. However, the site is facing numerous operational inefficiencies and regulatory non-compliance issues that must be urgently addressed.

- **Environmental Protection Act 1994:** Inadequate waste management, potential pollution, and land degradation risks that could expose the Lockyer Valley Regional Council (LVRC) to legal actions, fines, and reputational damage.
- **Animal Welfare Standards and Mode Code of Practice:** Deficiencies in the handling, housing, and welfare of animals, which may result in legal consequences under animal welfare laws and potential civil litigation from advocacy groups.
- **Workplace Health and Safety (WHS) Risks:** Unsafe working conditions that expose staff and attendees to injury or illness, increasing the risk of worker claims under WHS legislation.

Immediate corrective actions are necessary to mitigate these risks and bring the saleyards into compliance. These include:

- **Environmental Remediation:** Developing a comprehensive plan for waste management, pollution control, and environmental mitigation measures.
- **Animal Welfare Improvements:** Upgrading facilities to meet legal animal welfare standards, including the Mode Code of Practice and Animal Welfare Standards.
- **Workplace Health and Safety Enhancements:** Implementing corrective measures to ensure the safety and well-being of staff and contractors, aligned with relevant WHS legislation.
- **Staff Training:** Ensuring all employees are trained on compliance requirements, animal welfare, and safety protocols to foster a culture of responsibility and legal compliance.
- **External PM:** Ensures a neutral position is taken and is impeachable with respect to all interested parties.
- **Works Schedule and Budget:** the work schedule and budget clinically outlines the required critical elements that must be addressed immediately and with a corresponding timeframe which allows regulatory bodies an understanding of the mitigation measure being taken.

The Laidley Saleyards’ current operational practices expose LVRC to considerable legal risks. Immediate corrective actions are required to ensure compliance with environmental, animal welfare, and workplace health and safety standards. Failure to address these issues could result in severe legal and financial consequences, including potential litigation, fines, and reputational damage. A comprehensive compliance strategy must be developed and implemented without delay.

By addressing these risks and establishing a comprehensive work plan, the saleyard is committed to maintaining a safe, efficient, and environmentally responsible operation. The continuous monitoring of safety practices and risk factors will help mitigate potential hazards and improve overall operational performance.

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