Decision Report

Application for licence

Division 3, Part V *Environmental Protection Act 1986*

Licence Number	L3128/2025/1
Applicant	Craig Mostyn Farms Pty Ltd
Application number	APP-0028997
Premises	Wongan Hills Piggery 2293 Yerecoin Southeast Road LAKE NINAN WA 6603
Date of Report	17 April 2026
Status of Report	Final

1. Purpose and scope of assessment

On 7 May 2025, Craig Mostyn Farms Pty Ltd (applicant) submitted an application for a licence to operate an existing piggery in the Shire of Wongan-Ballidu, under Division 3 Part V of the *Environmental Protection Act 1986* (EP Act).

The applicant advises the design capacity of the piggery is 8,240 standard pig units (SPU), triggering the requirement to hold a licence in accordance with Schedule 1 of the *Environmental Protection Regulation 1987* for Category 2: intensive piggery - premises on which pigs are fed, watered and housed in pens.

This decision report documents the department's assessment of potential risks to the environmental and public health from emissions and discharges during the operation of the intensive piggery at the premises. As a result of this assessment, licence L3128/2025/1 has been granted.

In completing the assessment documents in this report, the department has considered and given due regard to its regulatory frameworks and relevant policy documents which are available at https://dwer.wa.gov.au/regulatory-documents.

2. Application details

Overview of premises

Wongan Hills Piggery (the premises) is an intensive indoor piggery that has been operating since the 1980s, about 10 km south-west of the town of Wongan Hills. It has not previously been subject to a works approval, licence, or planning approval.

The applicant leases the piggery from Myara Downs Pty Ltd, which is situated on 10 ha on the western boundary of Lot 1793 Yerecoin South East Road. Lot 1793 is 121 ha in size and is bounded by rural land owned by Myara Downs Pty Ltd.

The piggery has an assessed design capacity of 8,000 pigs, or 8,240 SPUs, and is certified under the Australian Pork Industry Quality Assurance Program (APIQ). Table 1 described the prescribed premises category for the premises, as defined in Schedule 1 of the Environmental Protection Regulations 1987.

Table 1: Prescribed premises categories

Classification of Premises	Description	Approved design capacity
Category 2	Intensive piggery: Premises on which pigs are fed, watered and housed in pens	No more than 8,000 pigs with a maximum of 8,240 SPU at any one time

Existing premises design and operation

The existing piggery is a grower farm with deep litter shelters, in which weaners from other breeder farms are brought to site and grown out to finishing weight. Piglets arrive on the premises at 3 weeks of age and are raised until they are about 24 weeks or until they meet the required weight for market.

The existing piggery comprises 36 shelters, with associated infrastructure and a 3.7 ha compost area. Pigs are housed according to their age range and pig class as seen in Table 2.

Table 2: Pig classes and numbers

helter (pig class)	Age Range (weeks)	SPU Factor	Number of shelters	Shelter size	Average number of pigs	Total SPU
Weaner	3 - 12	0.5	6	22 m x 12 m	2,400	1,200

helter (pig class)	Age Range (weeks)	SPU Factor	Number of shelters	Shelter size	Average number of pigs	Total SPU
Grower	12 - 16	1.0	16	25 m x 10 m	3,200	3,200
Finisher	16 - 24	1.6	12	25 m x 10 m	2,400	3,840
Total					**8,000**	**8,240**

Note: The SPU Factor is detailed in Table 5.1, Section 5 of the NEGIP.

Shelters (deep litter)

Different size shelters are used for grouping each class of pig, depending on their age (Table 2). The shelters used to house the pigs are comprised of a roofed structure over a hardstand base, with straw used for bedding and the collection of waste. In addition to those specified in Table 2, there is also a holding shed (25 m x 10 m) that houses up to 240 finisher pigs, prior to transport off-site, and a hospital shelter (5 m x 4 m) for sick animals.

Thirty-one of the 36 shelters have been constructed with a concrete base and walls; the remaining five have a compacted earthen base and timber walls. All have a 2 m concrete apron that extends from the eastern end of the shelter and a tarpaulin roof. Straw is used as bedding and to absorb manure, urine, spilt water and food.

Each shelter is cleaned every eight weeks, where spent bedding is scraped onto the concrete apron and replaced. The shelters are occasionally washed with water during cleaning, with weaner shelters being pressure washed at every cleaning. Wash water is absorbed by the spend bedding before it is transported to the compost area via telehandler.

The shelters are orientated east-west to improve ventilation and reduce the need for mechanical heating and cooling. In summer, the east-west orientation allows for morning easterly and afternoon westerly, south-westerly and south-easterly winds to tunnel through the shelters, allowing for natural cooling.

Spend bedding and mortality management

Spent bedding is removed every eight weeks and transferred to the compost area, whilst mortalities are removed daily (~10 per week) and placed in the burial pit.

The applicant advises spent bedding is placed in windrows 100-150 m in length, 1.5 m in width and 1.5 m in height, and orientated in a north-south direction. The windrows are regularly turned and processed for 4-6 months before being spread over nearby paddocks or taken off-site for use. No sampling of the compost product was specified by the applicant.

The compost area is a 3.7 ha paddock that slopes to the south and located directly west of the shelters. The burial pit is located on an adjoining property (Lot 3267). Both these areas are currently not bunded or lined.

Proposed works

The applicant has proposed upgrades to the shelters, compost area, mortality management, and groundwater monitoring on the premises in order to reduce environmental risk and to be consistent with the national environmental guidelines (NEGIP).

It is proposed to upgrade the shelters to ensure effluent and leachate is contained, and to replace the floor of those shelters that have a compacted earthen base with concrete, if it cannot be demonstrated that it meets a permeability of less than 1×10^{-9} m/s for a minimum depth of 300 mm. The applicant will also replace the timber-walled shelters with concrete or install concrete bunding around these shelters to prevent runoff.

The applicant has proposed the installation of an earthen bund around the compost area to prevent surface runoff, and the construction of a drainage basin for the collection and evaporation of surface runoff and leachate. The applicant has also requested provision to

construct a carcass tunnel in the existing compost area to allow for the composting of mortalities, as an alternative to the current burial management.

To ensure there is no groundwater contamination occurring as a result of the operation of the premises, the applicant has also included the installation of groundwater monitoring bores.

3. Industry guidelines

The NEGIP provides a general framework for managing the environmental issues associated with indoor piggeries in Australia.

The criteria outlined in Appendix B of the NEGIP has been used as a baseline for rating the vulnerability of major natural resources from the existing piggery operations and the risk of environmental impacts from the existing design and operational features.

Table 3 provides an indication of the risk of the existing piggery using the NEGIP criteria, where 1 is low risk and 4 is high risk (note: this has been used to inform, and does not constitute, the department's risk assessment, which is in Section 6).

Table 3: Summary of Wongan Hills Piggery against NEGIP performance guidelines

NEGIP aspect	Risk criteria – NEGIP performance guidelines	Risk rating
Amenity and natural resources vulnerability		
Groundwater quality and availability	Depth to groundwater is always at least 10 m below the ground surface or the base of any piggery infrastructure	2
	Groundwater used in the piggery is supplied by surrounding farms	N/A
Surface water quality and availability	The piggery is located within 100 m of the closest watercourse	3
	The piggery is located at least 800 m from the closest major water supply storage	1
	The piggery is located above the 1:100 year flood line	1
Community amenity	The piggery has received no complaints from the public or regulators for at least 5 years	1
	Levels of odour, dust and noise around the property boundary area are checked occationally	3
	Surrounding land is all designated rural and is not designated for future development or rezoning	1
	The piggery is fairly well concealed from roads and neighbours	2
	The entrance point to the farm provides at least 300 m good visibility in both directions	1
	Vehicle movements and other noisy activities occur only during the day, except under exceptional circumstances	1
	Mechanical equipment used on-farm is generally fitted with manufacturer specified exhaust devices	2
	Dust from traffic movements, manure handling and reuse and feed milling is not specifically controlled but dust does not seem to cause nuisance	2
	There is a complaints management procedure is in place that includes complaints recording, investigation and corrective action	2
Design and operation		
Pig housing	Shelters are oriented east-west and are constructed to maintain temperatures within the required range with no mechanical	1

	heating or cooling	
	The shelter bases are formed from well-compacted clay or other low permeability material for deep litter sheds	2
	Feeding systems minimise feed wastage	1
	Stocking densities meet the requirements of the *Model Code of Practice for the Welfare of Animals: Pigs*	1
	The bedding in deep litter sheds is mostly kept dry and friable; pigs are generally clean	2
	The outflow of effluent from sheds is not well controlled	3
	Water used to washdown deep litter housing after spent bedding removal is contained within each shelter and absorbed by the spent bedding	3
Solid waste storage	Solid waste storage areas are not within a controlled drainage area	4
	The base of solid waste storage area is not built from well compacted clay or other low permeability material	4
	The depth to water tables beneath the base of manure storage areas exceeds 2 m at all times	1
	Windrows are always managed to maintain low odour emissions	1
Mortalities management	Dead pigs are almost always removed from the sheds or pens daily	2
	Mortalities management always occurs within 24 hours of death	1
	Mortalities management is by burial in a clay-lined pit	2
	Mortalities management areas are not on a well-sealed site	3
	Mortalities are generally not promptly covered with at least 300 mm of sawdust or soil or not continuously kept covered.	3
	Mortalities management does not occur within a controlled drainage area	4
	In the case of a mass mortalities event, there is no site selected or plan for managing mass mortalities	4

3.1 Comparison with NEGIP criteria

Sitting and design

The premises is located on Lot 1793, which has an area of 121 ha in the Wheatbelt of Western Australia. Its experiences cool, wet winters and hot dry summers, with a mean annual rainfall of 387 mm in 2024 (BOM, 2024). Most of the surrounding land has been cleared for farming and is owned by Myara Downs Pty Ltd. The nearest town is Wongan Hills which is 9.6 km north-east of the premises. The closest rural residential premises that is not owned by Myara Downs Pty Ltd is 3.4 km north of the premises and there are no known complaints having been received by the department or the Shire of Wongan-Ballidu for the premises.

Groundwater in the vicinity of the premises is not proclaimed under the *Rights in Water Irrigation Act 1914* (RIWI Act) and as such, no licence or other approval is required to take groundwater. Depth to groundwater is 10 – 14 mbgl at the premises, however, the applicant accesses groundwater from bores located in the Myara Downs farm at a depth of 20 mbgl.

The premises is situated within the Avon River System which is a proclaimed surface water area under the RIWI Act, and 1.86 km south-east of a tributary of the Avon River. Lake Ninan Nature Reserve and associated wetlands are within 1 km of the premises to the south,

southeast and east, with a minor tributary to Lake Ninan flowing directly adjacent to the premises boundary. As the premises slopes to the south, the applicant has proposed bunding around the compost area and timber walled shelters to prevent surface runoff to these receptors.

A nationally recognised threatened ecological community (TEC) – the Eucalyptus Woodlands of the WA Wheatbelt, which is listed as critically endangered under federal environmental protection laws (*Environment Protection and Biodiversity Conservation Act 2016*) is also located 1 km east of the premises.

The design and operation of the shelters appear to be consistent with the NEGIP from an animal welfare perspective, in terms of stocking densities, general animal cleanliness and husbandry, however, the current lack of washdown water containment from the shelters is noted.

Waste management

The premises is located within the Wongan Hills soil system characterised by yellow and loamy duplexes, yellow deep sands, loamy and shallow gravels, brown loamy earth and loamy duplexes. The surficial soils present over the surface of the composting area primarily comprise of clayey sand/sandy clay extending from the ground surface to the depth of 1.5 m.

The NEGIP recommends manure should only be stored or composted within an impermeable (e.g. concreted or sealed to a design permeability of $1x10^{-9}$ for a depth of 300 mm) and bunded area. However, there is currently no bunding present around the compost area, and the existing hardstand has a permeability greater than 1×10^{-9} m/s. The proposal to construct an impermeable and bunded hardstand area for composting operations, including a runoff basin, will ensure this aspect of the piggery meets the environmental protection guidelines under the NEGIP.

Mortalities are currently buried on the adjoining Lot 3267, which is significantly closer to the Lake Ninan Nature Reserve and associated wetlands. Additionally, runoff from the burial area is not currently controlled, with no bunding present and the permeability of the base unconfirmed. The NEGIP recommends that mortality management areas are impervious and specifies rendering or composting as the preferred method of mortalities management. The proposal to construct a concrete carcass tunnel, for mortality composting, will ensure the piggery meets these recommendations.

The proposal to properly compost all piggery wastes is the most preferred option under the NEGIP and, if done correctly, produces a stablised material that poses a low risk of odour and to public health. The proposal to remove all finished composted material from site further reduces the risk profile of the premises. The management of effluent via a closed loop system (evaporation and adding to compost windrows) is also preferred and further reduces the risk profile of the premises (compared to on-site disposal via irrigation).

4. Other approvals

The premises is located in the Shire of Wongan-Ballidu, where the piggery has been operating on the premises since 1996. At the time of establishment, the piggery was approved and consistent with the Local Planning Scheme, therefore, the Shire have specified that the piggery is permitted to continue operation in its current form.

5. Consultation

Table 4 provides a summary of the consultation undertaken by the department.

Table 4: Consultation

Consultation method	Comments received
Application was advertised on the department's website on 25 November 2025	A public submission raised concerns regarding the: (a) permeability of the compost area hardstand; (b) absence of bunding or a leachate containment system around the compost area; (c) the design of the mortality composting tunnel; (d) stormwater management plan; (e) odour, dust and noise emissions; (f) proposed bore monitoring frequency; (g) risks to the environment; and (h) compost management plan;
Local Government Authority (Shire of Wongan-Ballidu) advised of proposal on 27 November 2025	The Shire of Wongan-Ballidu advised it has no evidence of any environmental issues associated with the premises and that it has no objections to the continued operation of the piggery.
Department of Biodiversity, Conservation and Attraction (DBCA) – Parks and Wildlife Service advised of proposal on 27 November 2025	DBCA advised the following: (a) there are no known threatened fauna / flora / threatened / priority ecological communities on or directly adjacent to the piggery premise; (b) there is potential issues associated with the piggery such as groundwater/surface water runoff (and the associated enhanced nutrient levels) into the adjacent DBCA-managed Lake Ninan Nature Reserve; and (c) a water quality monitoring system to detect early adverse changes in water quality and the associated downstream impacts should be implemented;
Department of Primary Industries and Regional Development (DPIRD) advised of proposal on 27 November 2025	DPIRD outlined the following concerns: (a) risk of leaching of nutrients and other contaminants to the groundwater resource and the surrounding environment; (b) limited information regarding the location of the mortalities composting tunnel it is unclear how nutrient-rich runoff or leachate will be captured and where it will be directed; and (c) the Environmental Management Plan provides only approximate depths to groundwater and does not include actual measurements or time series measurements to verify these estimates.

6. Risk assessment

6.1 Determination of emission, pathway and receptor

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guideline: Risk Assessments* (DWER 2020).

To establish a risk event there must be an emission, a receptor which may be exposed to that emission through an identified actual or likely pathway, and a potential adverse effect to the receptor from exposure to that emission.

6.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for each identified emission source and takes into account identified potential source-pathway and receptor linkages. Where linkages are in-complete they have not been considered further in the risk assessment.

Where the applicant has proposed mitigation measures/controls, these have been considered when determining the final risk rating. Where the delegated officer considers the applicant's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the licence as regulatory controls.

Additional regulatory controls may be imposed where the applicant's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in the below table.

Risk assessment table

The table below describes the risk events associated with the proposal consistent with the *Guideline: Risk Assessments* (DWER 2020). The table identifies whether the risk events are acceptable and tolerated, or unacceptable and not tolerated, and the appropriate treatment and degree of regulatory control, where required.

Risk Event				Consequence rating[1]	Likelihood rating[1]	Risk[1]	Reasoning	Regulatory controls
Source/ Activities	**Potential emissions**	**Potential receptors, pathway and impact**	**Applicant controls**					
Category 2: Intensive piggery construction								
Construction works for carcass tunnel, compost area, eco-shelters, and groundwater monitoring bores.	Noise Dust	Unreasonable interference with the health and amenity of nearby sensitive receptors (>3.4 km).	Maintain existing separation distance to sensitive receptors. Vehicles and machinery only operate during daylight hours. Maintain complaints system and address any complaints.	Low level onsite impacts and minimal offsite impacts **Minor**	The risk event may only occur in exceptional circumstances **Rare**	**Low** Acceptable, generally not controlled	Some noise and dust is expected during construction, however, the nature of the construction is likely to be consistent with that of a typical rural area and given the separation to nearby receptors and being located within a rural area, the Delegated Officer does not reasonably foresee noise or dust impacting receptors.	Works condition (Condition 1), outlining the construction/installation requirements for the carcass tunnel, compost area upgrades, shelter upgrades and groundwater bores. Complaints management condition (Condition 16), specifying reporting requirements.
Category 2: Intensive piggery operations								
Holding, feeding and watering animals within eco-shelters	Nutrient-laden effluent (spilt feed, water, urine, faeces) accumulated in shelter and from cleaning	Seepage/infiltration around shelters causing contamination of soil and groundwater 10 – 14 mbgl. Overland runoff causing contamination of minor surface water tributary to Lake Ninan that runs adjacent to the premises boundary.	Installation of groundwater monitoring bores. Upgrade of shelters to ensure they meet the permeability criteria in "Better Practice Organics Recycling" (DWER, 2022). Regular maintenance of feeding and watering systems. Shelters cleaned every 8 weeks. Spend bedding is stored on the concrete base of eco-shelters before being transported to the compost area on the same day as cleaning. Mortalities removed from shelters daily.	Low level onsite impacts and minimal offsite impacts **Minor**	The risk event could occur at some time **Possible**	**Medium** Acceptable, generally subject to regulatory controls	The NEGIP recommends a minimum buffer distance of 100 m from the piggery complex to any natural watercourse, wetland or lake and 800 m from a major water supply storage. The shelters are located within 20 m of a minor tributary to Lake Ninan and >680 m from Lake Ninan Nature Reserve and associated wetlands. Spent bedding is removed and replaced in each shelter every 8 weeks with occasional washdowns occurring, and with weaner shelters pressure washed at each cleaning. Most of the water is absorbed by the spent bedding and removed from the shelter, however any potential outflow is currently not controlled. Additionally, a number of shelters do not have an impervious base or walls with timber walls and soil based shelters present. This design increases the risk of effluent and leachate contaminating the surrounding environment. Due to these factors the Delegated Officer has included the applicant's control of implementing upgrades to the existing shelters and has conditioned that the shelters will all have a concrete or compacted soil base with a permeability of 1 x 10^{-9} m/s for a minimum depth of 300 mm, which is consistent with the NEGIP environmental protection guidelines. Additionally, design and operational requirements to ensure outflow does not occur have been added to the licence. The Delegated Officer has conditions for groundwater monitoring bores to be installed to ensure that contamination of groundwater is not occurring. These bores will monitor the standing water level, pH, electrical conductivity, total nitrogen, total phosphorus, biological oxygen demand and exchangeable cations of groundwater quarterly throughout the year once installed.	Works condition (Condition 1), outlining the construction/installation requirements for the shelters and groundwater bores. Reporting condition (Condition 3), that requires evidence that all shelters on the premises have an impermeable base. Infrastructure and equipment design condition (Condition 4), specifying the design requirements for the shelters. Infrastructure operation requirement condition (Condition 6), stating the operational requirements for the shelters. Monitoring condition (Condition 13), identifying monitoring requirements for new bores.
	Odour from spent bedding and mortalities	Unreasonable interference with the health and amenity of nearby sensitive receptors (>3.4 km).	Maintain separation distance to sensitive receptors. Stocking densities meet the APIQ requirements. Shelters orientated east-west for natural ventilation. Regular maintenance of feeding and watering systems. Shelters cleaned every 8 weeks. Mortalities removed from shelters daily. Maintain complaints	Low level impact to amenity **Minor**	The risk event will probably not occur in most circumstances **Unlikely**	**Medium** Acceptable, generally subject to regulatory controls	Odour is recognised as the principal community amenity concern in relation to piggery development and operation. The NEGIP recommends fixed separation distances of at least 250 m to rural dwellings and 750 m to a townsite. The closest rural dwelling is approximately 3.4 km north of the piggery, with two others within a 4 km radius. The nearest small town of Wongan Hills is 9.6 km to the north-east and there is no recorded history of odour complaints from historical operations at the premises. Due to these factors the Delegated Officer considers there is sufficient separation in place (>3.4 km) to nearby receptors and, therefore, does not reasonably foresee that odour from the shelters will impact receptors, provided the deep litter shelters are managed according to NEGIP recommendations. Shelters are also cleaned every 8 weeks and mortalities are removed daily, reducing the risk of odour emissions. The Delegated Officer has included these operational requirements for the shelters in the licence.	Infrastructure and equipment design condition (Condition 4), specifying the design requirements for the shelters. Infrastructure operation condition (Condition 6), stating the operational requirements for the shelters. Monitoring condition (Condition 12), outlining the monitoring requirements for pig numbers.

Risk Event				Consequence rating[1]	Likelihood rating[1]	Risk[1]	Reasoning	Regulatory controls
Source/ Activities	**Potential emissions**	**Potential receptors, pathway and impact**	**Applicant controls**					
			system and address any complaints.					
	Noise from animals and machinery movements		Maintain separation distance to sensitive receptors. Vehicles and machinery operation during daylight hours. Stocking densities meet the APIQ requirements. Maintain complaints system and address any complaints.	Low level impact to amenity **Minor**	The risk event may only occur in exceptional circumstances **Rare**	**Low** Acceptable, generally not controlled	Some noise is expected during operation of the piggery, however, the nature of animal noise and machinery movements is likely to be consistent with that of a typical rural area and given the separation to nearby receptors and being located within a rural area, the delegated officer does not reasonably foresee noise impacting receptors. There is no recorded history of noise complaints from historical operations at the premises Providing the deep litter shelters are managed according to NEGIP requirements, the risk of off-site noise impacts from the operation of the deep litter shelters appears to be acceptable.	Infrastructure and equipment design condition (Condition 4), specifying the design requirements for the shelters. Infrastructure operation condition (Condition 6), stating the operational requirements for the shelters. Monitoring condition (Condition 12), outlining the monitoring requirements of pig numbers.
Spend bedding management – compost area	Nutrient-laden leachate and effluent	Seepage/ infiltration in compost area causing contamination of soil and groundwater 10 – 14 mbgl. Overland runoff causing contamination of minor surface water tributary to Lake Ninan adjacent to the premises and Lake Ninan Nature Reserve and associated wetlands >680 m from the premises.	Installation of an earth bund downslope of the composting area. Installation of drainage basin for evaporation. Installation of groundwater monitoring bores. Composting windrow managed in accordance with the AS445-2012.	Mid level onsite impacts and low-level impacts on a local scale **Moderate**	The risk event could occur at some time **Possible**	**Medium** Acceptable, generally subject to regulatory controls	The NEGIP recommends that manure should only be stored or composted within an impermeable, bunded area. There is currently no bunding present around the compost area and the existing hardstand has a permeability higher than 1 x 10 $^{-9}$ m/s. Due to this the Delegated Officer has conditioned the applicant to install impermeable bunding around the entirety of the compost area (as proposed) and install an impermeable liner (concrete or clay compacted for a design permeability of 1 x 10-9 m/s for a depth of 300 mm) underneath the entirety of the area. This bunded area is expected to produce effluent and leachate during operation; therefore, the Delegated Officer has also conditioned the construction of a drainage basin (as proposed) at the lowest point of the compost area to collect and evaporate effluent and leachate. Groundwater monitoring bored will also be installed to ensure that contamination of groundwater is not occurring. These bores will monitor the standing water level, pH, electrical conductivity, total nitrogen, total phosphorus, biological oxygen demand and exchangeable cations of groundwater quarterly throughout the year once installed. Once spent bedding is processed to produce a pasteurised product, it may be taken off-site for spreading without additional approvals under Part V of the EP Act. Due to this there are no reuse areas considered in this licence. The Delegated Officer has decided to include conditions, in addition to specifying processing requirements, to ensure that raw or unprocessed manure is not being transported off-site.	Works condition (Condition 1), outlining the construction/installation requirements of the compost area and groundwater monitoring bores. Reporting condition (Condition 3), that requires evidence that the drainage basin is adequately sized for the compost area. Infrastructure and equipment design condition (Condition 4), specifying the design requirements for the compost area. Infrastructure operation condition (Condition 6), stating the operational requirements for the compost area. Emission and discharge conditions (Condition 7, 8, 9, and 10), specifying the management, monitoring and reporting requirements for spent bedding and mortality management. Monitoring condition (Condition 13), identifying monitoring requirements for new bores.
	Odour from composting windrows	Unreasonable interference with the health and amenity of nearby sensitive receptors (>3.4 km).	Maintain separation distance to sensitive receptors. Composting windrow managed in accordance with the AS445-2012. Maintain complaints system and address any complaints.	Low level impact to amenity **Minor**	The risk event will probably not occur in most circumstances **Unlikely**	**Medium** Acceptable, generally subject to regulatory controls	The NEGIP recommends fixed separation distances of at least 250 m to rural dwellings and 750 m to a townsite. The closest rural dwelling is approximately 3.4 km north of the piggery, with two others within a 4 km radius. There is no recorded history of odour complaints from historical operations at the premises. The Delegated Officer considers there is sufficient separation in place (>3.5 km) to nearby receptors and, therefore, does not reasonably foresee that odour from the compost area will impact receptors, provided the compost area is managed according to NEGIP recommendations and Australian Standard AS4454-2012.	Infrastructure and equipment design condition (Condition 4), specifying the design requirements for the compost area. Infrastructure operation condition (Condition 6), stating the operational requirements for the compost area.
	Dust		Maintain separation distance to sensitive receptors. The moisture content of windrows will be maintained (40–65%). Maintain complaints system and address any complaints.	Low level impact to amenity **Minor**	The risk event will probably not occur in most circumstances **Unlikely**	**Medium** Acceptable, generally subject to regulatory controls	By maintaining the moisture content of the windrows in accordance with the AS4454-2012 they will be kept in a damp state, preventing dust lift-off from occurring. The Delegated Officer has included this in the operational requirements for the compost area. Delegated officer considers there is sufficient separation in place (>3.4 km) to nearby receptors, and there is no recorded history of complaints from historical operations at the premises and therefore does not reasonably foresee that dust from the compost area will impact receptors, provided the compost area is managed according to NEGIP recommendations and Australian Standard AS4454-2012.	Infrastructure and equipment design condition (Condition 4), specifying the design requirements for the compost area. Infrastructure operation condition (Condition 6), stating the operational requirements for the compost area.

Risk Event				Consequence rating[1]	Likelihood rating[1]	Risk[1]	Reasoning	Regulatory controls
Source/ Activities	**Potential emissions**	**Potential receptors, pathway and impact**	**Applicant controls**					
	Noise from machinery		Maintain separation distance to sensitive receptors. Vehicles and machinery operate during daylight hours Maintain complaints system.	Low level impact to amenity **Minor**	The risk event may only occur in exceptional circumstances **Rare**	**Low** Acceptable, generally not controlled	Some noise is expected during operation of the piggery; however, the nature of the machinery movements is likely to be consistent with that of a typical rural area and given the separation to nearby receptors and being located within a rural area, the delegated officer does not reasonably foresee noise impacting on off-site receptors from piggery operations. There is no recorded history of noise complaints from historical operations at the premises.	Infrastructure and equipment design condition (Condition 4), specifying the design requirements for the compost area. Infrastructure operation condition (Condition 6), stating the operational requirements for the compost area.
Mortalities management – burial pit	Nutrient-laden leachate from decomposing animals	Seepage/infiltration causing contamination of soil and groundwater 10 – 14 mbgl. Overland runoff causing contamination of Lake Ninan Nature Reserve and associated wetlands within 30 m of burial lot.	Increase separation distance to sensitive receptors. Ensuring minimum 2 m separation to shallow groundwater. Construction of a concrete composting tunnel for mortality management. Install groundwater monitoring bores.	Mid level onsite impacts and low-level impacts on a local scale **Moderate**	The risk event could occur at some time **Possible**	**Medium** Acceptable, generally subject to regulatory controls	NEGIP recommends a minimum buffer distance of 100 m from the piggery complex to any natural watercourse, wetland or lake and 800 m from a major water supply storage. The burial pit is located on Lot 3264 approximately 30 m from Lake Ninan Nature Reserve and associated wetlands and is not bunded and has an unknown base permeability. The Delegated Officer has, therefore, determined that there is an unreasonable risk to the environment as a result. The applicant has proposed the installation of a carcass tunnel for the composting of mortalities, which will replace the existing burial and is the preferred method of mortality management under the NEGIP. The carcass tunnel will be constructed out of concrete and will be located in the existing compost area, that is conditioned to be an impermeable, bunded area, with a drainage basin at the lowest point. The construction of the carcass tunnel is not anticipated to change the risks associated with the compost area and is expected to decrease the risks associated with mortality management as composting to the Australian Standard AS4544 is the most preferred management option under the NEGIP. Additionally, the compost area is further from both environmental and human receptors than the existing burial pit. The Delegated Officer has conditioned the construction, operation and management of the carcass tunnel in line with that proposed by the applicant and has determined that the risk associated with the carcass tunnel is acceptable provided the carcass tunnel is operated in accordance with the AS4454-2012 standards.	Works condition (Condition 1), outlining the construction/installation requirements of the carcass tunnel, compost area and groundwater monitoring bores. Infrastructure and equipment design condition (Condition 4), specifying the design requirements for the burial pit and carcass tunnel (once installed). Infrastructure operation condition (Condition 6), stating the operational requirements for the burial pit and carcass tunnel (once installed). Emission and discharge conditions (Condition 7, 8, 9, and 10), specifying the management and monitoring requirements for spent bedding and mortality management. Submission condition (Condition 11), requesting the submission of a mass mortality plan for the premises. Monitoring condition (Condition 12), outlining the monitoring requirements form mortality numbers. Monitoring condition (Condition 14), identifying monitoring requirements for new bores.
	Odour, from deceased animals burial pit	Unreasonable interference with the health and amenity of nearby sensitive receptors (>2.8 km).	Increase separation distance to sensitive receptors. Construction of a concrete composting tunnel for mortality management. Composting will be managed in accordance with the Australian Standard AS445-2012. Carcasses covered with 300 mm of spend bedding immediately after being placed in tunnel Maintain complaints system and address any complaints.	Low level impact to amenity **Minor**	The risk event could occur at some time **Possible**	**Medium** Acceptable, generally subject to regulatory controls	The NEGIP recommends fixed separation distances of at least 250 m to rural dwellings and 750 m to a townsite. The closest rural dwelling is approximately 2.8 km from the burial pit, therefore, the delegated officer considers there is sufficient separation in place to nearby receptors. The Delegated Officer does not reasonably foresee that odour from the burial pit will impact on the amenity or health of these receptors, providing the mortalities are placed into the pit daily and immediately covered with 300 mm of soil. As this control is critical for maintaining an acceptable level of risk, it will be conditioned on the licence as operational controls. Additionally, the applicant has proposed the construction of a carcass tunnel on the premises for the composting of mortalities. The carcass tunnel will be constructure in the existing compost area, that is further from both environmental and human receptors than the existing burial pit. The construction of the carcass tunnel is expected to decrease the risks associated with mortality management as composting to the Australian Standard AS4544 is the most preferred management option under the NEGIP. The Delegated Officer has conditioned the management of the carcass tunnel in line with that proposed by the applicant and has determined that the risk associated with the carcass tunnel is acceptable provided the carcass tunnel is operated in accordance with the AS4454-2012 standards.	Works condition (Condition 1), outlining the construction/installation requirements of the carcass tunnel, compost area and groundwater monitoring bores. Infrastructure and equipment design condition (Condition 4), specifying the design requirements for the burial pit and carcass tunnel (once constructed). Infrastructure operation condition (Condition 6), stating the operational requirements for the burial pit and carcass tunnel (once constructed). Emission and discharge conditions (Condition 7, 8, 9, and 10), specifying the management and monitoring requirements for spent bedding and mortality management. Submission conditions (Condition 11), requesting the submission of a mass mortality plan for the premises. Monitoring condition (Condition 12), outlining the monitoring requirements.

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the Guideline: Risk Assessments (DWER 2020).

7. Decision

The delegated officer has determined that continued operation of the existing piggery, with an assessed capacity of 8,240 SPUs, does not pose an unacceptable risk of impacts to public health or the environment, providing the following improvements are completed:

- construction of an impermeable liner, bunding and a drainage basin in the existing compost area where spent bedding and mortalities are managed;
- upgrades to existing shelters that do not have a concrete or impermeable base, concrete walls or concrete bunding to prevent surface runoff; and
- installation of at least three groundwater monitoring bores, both upgradient and downgradient, of the existing compost area.

The remaining aspects of the operation, such as the siting, design and day-to-day management of the piggery have been assessed as being consistent with the NEGIP and does not pose an unacceptable risk of impacts to public health and the environment. This is based on the following:

- the piggery being located on agricultural land and well separated from populated areas;
- spent bedding and mortalities being adequately processed, such that the processed material can be taken off the premises for spreading without posing an unacceptable risk to public health or the environment; and
- there being no recorded complaints by the shire or the department from piggery operations to date.

Draft decision and applicant comments

Draft licence L3128/2025/1 that accompanies this report authorises emissions and discharges from ongoing operations of the existing piggery complex (8,240 SPU capacity). The proposed conditions in the licence, as outlined in the above risk table, have been determined in accordance with the *Guideline: Setting Conditions* (DWER 2020).

The applicant was provided with drafts of the licence and this report on 11 March 2026 and sought only minor comments or corrections.

8. Conclusion

This assessment of the risks of activities on the premises has been undertaken with due consideration of a number of factors, including the documents and policies specified in this decision report.

Based on this assessment, it has been determined that the issued licence will be granted for a period of 20 years and subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

References

1. Queensland Government 2023, Technical Note 208: *Managing Slaking and Dispersive Soil risk in transport infrastructure projects*
2. DWER 2016, *Guideline: Environmental Sitting.* Perth, Western Australia.
3. DWER 2017, *Guideline: Risk Assessment*. Perth, Western Australia.
4. DWER 2022*, Guideline: Better Practice organics recycling.* Perth, Western Australia*.*
5. Australian Pork Limited 2015*, Piggery Manure and Effluent Management and Reuse Guidelines.* Kingston, Australia Capital Territory*.*

6. Australian Pork Limited 2025*, National Environmental Guidelines for Indoor Piggeries (NEGIP): Siting and Design.* Kingston, Australia Capital Territory.

7. Galt Geotechnics 2025*, Geotechnical Study Composting Area at Graig Mostyn Wongan Hills Yerecoin Souteast Road Lake Ninan, Western Australia*. Perth, Western Australia.

8. Craig Mostyn Group Pty Ltd 2025*, Wongan Hills Piggery: Composting Management Plan.* Perth, Western Australia.

9. Craig Mostyn Group Pty Ltd 2025*, "Wongan Hills" Piggery Environmental Plan.* Perth, Western Australia.