



Licence

Environmental Protection Act 1986, Part V

Licensee: Inghams Enterprises Pty Ltd

Licence: L7477/2001/9

Registered office: 203 Northumberland Street
LIVERPOOL NSW 2170

ACN: 008 447 345

Premises address: Lot 68 on Diagram 98482
9 Baden Street
OSBORNE PARK WA 6017
as depicted in Schedule 1

Issue date: Thursday, 14 January 2016

Commencement date: Friday, 22 January 2016

Expiry date: Thursday, 21 January 2021

Prescribed premises category

Schedule 1 of the *Environmental Protection Regulations 1987*

| Category number | Category description | Category production or design capacity | Approved Premises production or design capacity |
|-----------------|---|--|---|
| 15 | Abattoir: premises on which animals are slaughtered | 1000 tonnes or more per year | Not more than 50 000 tonnes per annual period |

Conditions

This Licence is subject to the conditions set out in the attached pages.

Date signed: 14 January 2016

.....
 Jonathan Bailes
 Manager Licensing (Process Industries)
 Officer delegated under section 20
 of the *Environmental Protection Act 1986*



Contents

| | |
|--|----|
| Introduction | 2 |
| Licence conditions | 4 |
| 1 General | 4 |
| 2 Improvements | 6 |
| 3 Information | 7 |
| Schedule 1: Maps | 9 |
| Schedule 2: Reporting & notification forms | 10 |

Introduction

This Introduction is not part of the Licence conditions.

DER's industry licensing role

The Department of Environment Regulation (DER) is a government department for the state of Western Australia in the portfolio of the Minister for Environment. DER's purpose is to advise on and implement strategies for a healthy environment for the benefit of all current and future Western Australians.

DER has responsibilities under Part V of the *Environmental Protection Act 1986* (the Act) for the licensing of prescribed premises. Through this process DER regulates to prevent, control and abate pollution and environmental harm to conserve and protect the environment. DER also monitors and audits compliance with works approvals and licence conditions, takes enforcement action as appropriate and develops and implements licensing and industry regulation policy.

Licence requirements

This Licence is issued under Part V of the Act. Conditions contained within the Licence relate to the prevention, reduction or control of emissions and discharges to the environment and to the monitoring and reporting of them.

Where other statutory instruments impose obligations on the Premises/Licensee the intention is not to replicate them in the licence conditions. You should therefore ensure that you are aware of all your statutory obligations under the Act and any other statutory instrument. Legislation can be accessed through the State Law Publisher website using the following link:

<http://www.slp.wa.gov.au/legislation/statutes.nsf/default.html>

For your Premises relevant statutory instruments include but are not limited to obligations under the:

- *Environmental Protection (Unauthorised Discharges) Regulations 2004* – these Regulations make it an offence to discharge certain materials such as contaminated stormwater into the environment other than in the circumstances set out in the Regulations.
- *Environmental Protection (Controlled Waste) Regulations 2004* - these Regulations place obligations on you if you produce, accept, transport or dispose of controlled waste.
- *Environmental Protection (Noise) Regulations 1997* – these Regulations require noise emissions from the Premises to comply with the assigned noise levels set out in the Regulations.

You must comply with your licence. Non-compliance with your licence is an offence and strict penalties exist for those who do not comply.



Licence holders are also reminded of the requirements of section 53 of the Act which places restrictions on making certain changes to prescribed premises unless the changes are in accordance with a works approval, licence, closure notice or environmental protection notice.

Licence fees

If you have a licence that is issued for more than one year, you are required to pay an annual licence fee prior to the anniversary date of issue of your licence. Non payment of annual licence fees will result in your licence ceasing to have effect meaning that it will no longer be valid and you will need to apply for a new licence for your Premises.

Ministerial conditions

If your Premises has been assessed under Part IV of the Act you may have had conditions imposed by the Minister for Environment. You are required to comply with any conditions imposed by the Minister.

Premises description and Licence summary

Ingham Enterprises Pty Ltd (Inghams) produces poultry products for the supermarket, food services and fast food industries and has operations across Australia and New Zealand. Ingham's operation at Osborne Park is an abattoir for processing chickens.

The main factory building encompasses the live bird area, evisceration and the production floor. Distribution and chilled storage areas are located to the north of the premises. The boilers, wastewater storage tanks, DAF treatment plant, ice bunker, and ammonia storage are located at the centre of the premises.

The premises was constructed approximately 40 years ago and is located in a light industrial area on the northern side of Baden Street in Osborne Park. Residential areas adjoin the premises to the east, north east and south east. The nearest residents are within 250 metres of the premises boundary. There are no surface water bodies that intersect the premises. The abattoir operates from Monday to Friday with three shifts commencing on Midnight Sunday until 3 pm on Friday afternoon. The shifts include two processing and one cleaning shift.

Key emissions and discharges associated with premises activities include odour emissions and solid and liquid waste generation.

This Licence is the successor to licence L7477/2001/8 and includes changes to the licence format.

The licences and works approvals issued for the Premises since 22/01/2006 are:

| Instrument log | | |
|----------------|------------|---|
| Instrument | Issued | Description |
| L7477/2001/6 | 22/1/2006 | Licence re-issue. |
| L7477/2001/7 | 14/8/2008 | Licence re-issue. |
| L7477/2001/8 | 22/01/2011 | Licence re-issue. |
| L7477/2001/9 | 14/01/2016 | This licence. Licence re-issue and changes to licence format. |

Severance

It is the intent of these Licence conditions that they shall operate so that, if a condition or a part of a condition is beyond the power of this Licence to impose, or is otherwise *ultra vires* or invalid, that condition or part of a condition shall be severed and the remainder of these conditions shall nevertheless be valid to the extent that they are within the power of this Licence to impose and are not otherwise *ultra vires* or invalid.

END OF INTRODUCTION



Licence conditions

1 General

1.1 Interpretation

1.1.1 In the Licence, definitions from the *Environmental Protection Act 1986* apply unless the contrary intention appears.

1.1.2 For the purposes of this Licence, unless the contrary intention appears:

'Act' means the *Environmental Protection Act 1986*;

'annual period' means the inclusive period from 1 January until 31 December in the same calendar year;

'CEO' means Chief Executive Officer of the Department of Environment Regulation;

'CEO' for the purpose of correspondence means:

Chief Executive Officer
Department Administering the Environmental Protection Act 1986
Locked Bag 33
CLOISTERS SQUARE WA 6850
Email: info@der.wa.gov.au;

'Licence' means this Licence numbered L7477/2001/9 and issued under the Act;

'Licensee' means the person or organisation named as Licensee on page 1 of the Licence;

'Premises' means the area defined in the Premises Map in Schedule 1 and listed as the Premises address on page 1 of the Licence;

'quarterly' means the 4 inclusive periods from 1 January to 31 March, 1 April to 30 June, 1 July to 30 September and 1 October to 31 December;

'Schedule 1' means Schedule 1 of this Licence unless otherwise stated;

'Schedule 2' means Schedule 2 of this Licence unless otherwise stated; and

'usual working day' means 0800 – 1700 hours, Monday to Friday excluding public holidays in Western Australia.

1.1.3 Any reference to an Australian or other standard in the Licence means the relevant parts of the standard in force from time to time during the term of this Licence.

1.1.4 Any reference to a guideline or code of practice in the Licence means the version of that guideline or code of practice in force from time to time, and shall include any amendments or replacements to that guideline or code of practice made during the term of this Licence.

1.1.5 Nothing in the Licence shall be taken to authorise any emission that is not mentioned in the Licence, where the emission amounts to:

- (a) pollution;
- (b) unreasonable emission;
- (c) discharge of waste in circumstances likely to cause pollution; or
- (d) being contrary to any written law.



1.2 General conditions

1.2.1 The Licensee shall immediately recover, or remove and dispose of spills of environmentally hazardous materials outside an engineered containment system.

1.3 Premises operation

1.3.1 The Licensee shall direct all contaminated or potentially contaminated wastewater generated from abattoir operations and animal holding facilities to the wastewater treatment system.

1.3.2 The Licensee shall ensure that where wastes produced on the Premises are not taken offsite for lawful use or disposal, they are managed in accordance with the requirements in Table 1.3.1.

| Waste Type | Process | Operational requirements |
|---|---------------------------------------|---|
| Treated wastewater | Disposal | Discharge to Water Corporation sewer |
| Solid waste generated on the premises | Temporary storage onsite | Temporary storage onsite in containment structure with permeability less than $1 \times 10^{-9} \text{m/s}$ |
| Sludge from wastewater treatment system | Filter cake from the DAF plant onsite | Temporary storage onsite in containment structure with permeability less than $1 \times 10^{-9} \text{m/s}$ |

1.3.3 The Licensee shall keep all entry points of the animal reception area and the processing area under negative pressure during normal operations.



2 Improvements

2.1 Improvement program

2.1.1 The Licensee shall complete the improvements in Table 2.1.1 by the date of completion in Table 2.1.1.

| Improvement reference | Improvement | Date of completion |
|------------------------------|---|---|
| IR 1 | <p>The Licensee shall submit to the CEO an Odour Management Plan. This plan must, for each potential odour source on the premises, include detail on:</p> <ul style="list-style-type: none">(i) each major odour emission source on the premises and associated risk of odour emissions generated under normal operating conditions;(ii) odour emission risk from each source identified in (i) under upset and emergency conditions including the estimated frequency of occurrence of such conditions;(iii) odour emissions monitoring strategy and parameters monitored;(iv) corrective actions to be implemented to address odour emissions from sources identified under (i) and (ii);(v) corrective actions to be implemented in the event of process failure or odour control equipment failure which may lead to unacceptable odour emissions from the premises; including triggers for action implementation;(vi) Procedure to evaluate the effectiveness of any corrective actions taken; and(vii) Identification of improvement measures, if necessary to minimise odour emissions from the premises and implementation proposal for the same. | 6 months from the date of granting this licence |



3 Information

3.1 Records

- 3.1.1 All information and records required by the Licence shall:
- (a) be legible;
 - (b) if amended, be amended in such a way that the original and subsequent amendments remain legible or are capable of retrieval;
 - (c) except for records listed in 3.1.1(d) be retained for at least 6 years from the date the records were made or until the expiry of the Licence or any subsequent licence; and
 - (d) for those following records, be retained until the expiry of the Licence and any subsequent licence:
 - (i) off-site environmental effects; or
 - (ii) matters which affect the condition of the land or waters.
- 3.1.2 The Licensee shall ensure that:
- (a) any person left in charge of the Premises is aware of the conditions of the Licence and has access at all times to the Licence or copies thereof; and
 - (b) any person who performs tasks on the Premises is informed of all of the conditions of the Licence that relate to the tasks which that person is performing.
- 3.1.3 The Licensee shall complete an Annual Audit Compliance Report indicating the extent to which the Licensee has complied with the conditions of the Licence, and any previous licence issued under Part V of the Act for the Premises for the previous annual period.
- 3.1.4 The Licensee shall:
- (a) implement a complaints management system that shall record the following information (if known or provided) about complaints received at the Premises concerning any environmental impact of the activities undertaken at the Premises:
 - (i) name and address of the complainants (if consented);
 - (ii) date and time of complaint;
 - (iii) date and time of alleged incident;
 - (iv) alleged source of the incident;
 - (v) general description of the alleged incident, including any environmental or health impacts reported by the complainant;
 - (vi) wind direction, wind speed and temperature at time of alleged incident;
 - (vii) likely source of the alleged incident; and
 - (viii) actions taken by the Licensee to address the complaint, including the outcome of any investigation(s) and action(s) to verify any impacts.
 - (b) complete an annual analysis and review of complaints recorded under 3.1.4(a) to identify any common factors and root cause of complaints and proposals to address these.

3.2 Reporting

- 3.2.1 The Licensee shall submit to the CEO an Annual Environmental Report within 31 calendar days after the end of the annual period. The report shall contain the information listed in Table 3.2.1 in the format or form specified in that table.



| Table 3.2.1: Annual Environmental Report | | |
|---|---|---------------------------------------|
| Condition or table (if relevant) | Parameter | Format or form¹ |
| - | Summary of any failure or malfunction of any pollution control equipment and any environmental incidents that have occurred during the annual period and any action taken | None specified |
| | Monthly record of animal numbers slaughtered at the premises and total live weight of animals slaughtered during the annual period | Tabular format |
| 3.1.3 | Compliance | Annual Audit Compliance Report (AACR) |
| 3.1.4 | Complaints summary | None specified |

Note 1: Forms are in Schedule 2

3.3 Notification

3.3.1 The Licensee shall ensure that the parameters listed in Table 3.3.1 are notified to the CEO in accordance with the notification requirements of the table.

| Table 3.3.1: Notification requirements | | | |
|---|--|---|-----------------------------------|
| Condition or table (if relevant) | Parameter | Notification requirement¹ | Format or form² |
| - | Any malfunction of the wastewater treatment system | As soon as practicable but no later than 5pm of the next usual working day. Notification details must include information on: <ul style="list-style-type: none"> (i) Time of system malfunction; (ii) A general description/ nature of the malfunction; (iii) The reason for the malfunction; (iv) Any on-site activities that may have led to the malfunction; (v) Action taken in response to the malfunction; and (vi) Estimated time for rectifying the malfunction unless the issue has been already resolved. | None specified |
| - | Scheduled maintenance of the processing or wastewater treatment plant or any component of those plants that has the potential to cause or increase odour emissions from the premises | As soon as practicable but no later than 7 days before the scheduled maintenance. | None specified |

Note 1: Notification requirements in the Licence shall not negate the requirement to comply with s72 of the Act

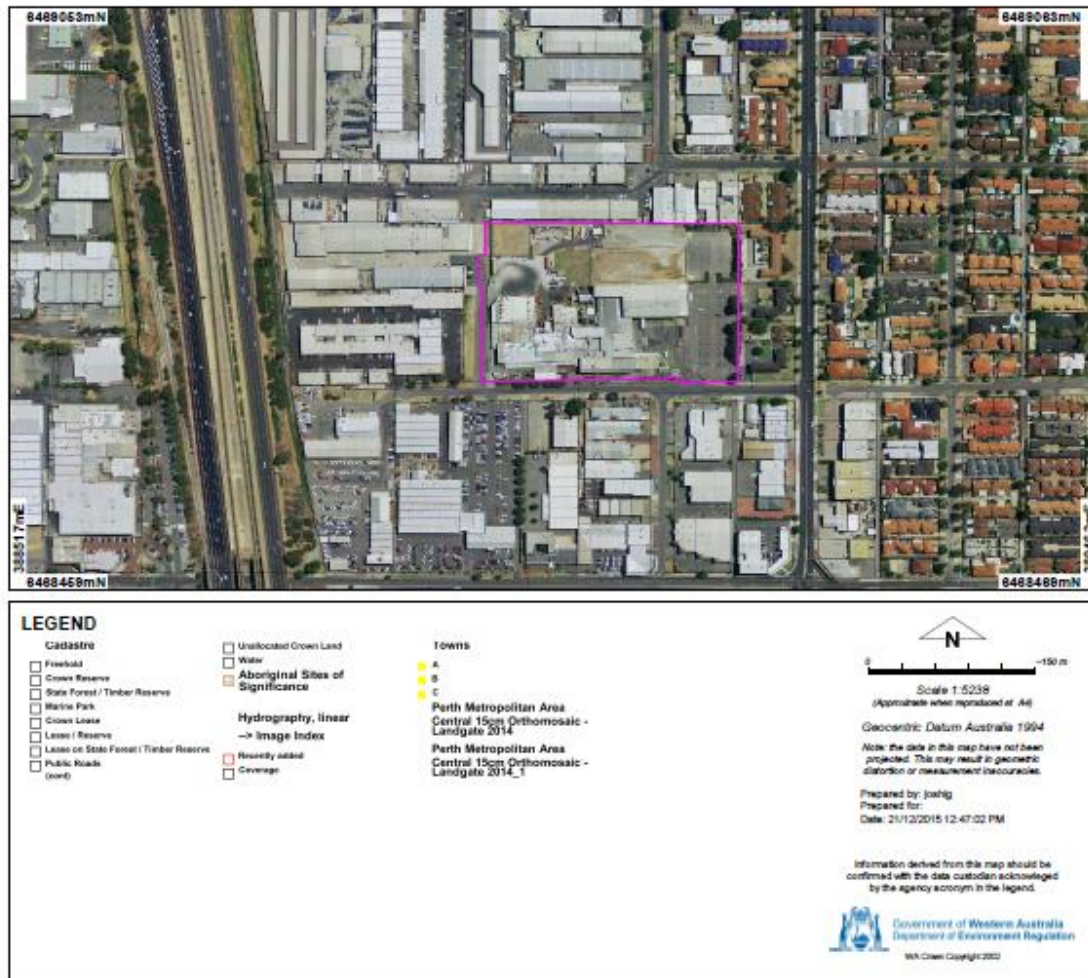
Note 2: Forms are in Schedule 2



Schedule 1: Maps

Premises map

The Premises is shown in the map below. The pink line depicts the Premises boundary.





Schedule 2: Reporting & notification forms

These forms are provided for the proponent to report monitoring and other data required by the Licence. They can be requested in an electronic format.

ANNUAL AUDIT COMPLIANCE REPORT PROFORMA

SECTION A LICENCE DETAILS

| | |
|-------------------------------------|----------------------|
| Licence Number: | Licence File Number: |
| Company Name: | ABN: |
| Trading as: | |
| Reporting period: _____ to _____ | |

STATEMENT OF COMPLIANCE WITH LICENCE CONDITIONS

1. Were all conditions of the Licence complied with within the reporting period? (please tick the appropriate box)

Yes Please proceed to Section C

No Please proceed to Section B

Each page must be initialled by the person(s) who signs Section C of this Annual Audit Compliance Report (AACR).

Initial:



SECTION B
DETAILS OF NON-COMPLIANCE WITH LICENCE CONDITION.

Please use a separate page for each Licence condition that was not complied with.

| | |
|---|-----------------------------|
| a) Licence condition not complied with: | |
| | |
| b) Date(s) when the non compliance occurred, if applicable: | |
| | |
| c) Was this non compliance reported to DER?: | |
| <input type="checkbox"/> Yes <input type="checkbox"/> Reported to DER verbally Date _____ <input type="checkbox"/> Reported to DER in writing Date _____ | <input type="checkbox"/> No |
| d) Has DER taken, or finalised any action in relation to the non compliance?: | |
| | |
| e) Summary of particulars of the non compliance, and what was the environmental impact: | |
| | |
| f) If relevant, the precise location where the non compliance occurred (attach map or diagram): | |
| | |
| g) Cause of non compliance: | |
| | |
| h) Action taken, or that will be taken to mitigate any adverse effects of the non compliance: | |
| | |
| i) Action taken or that will be taken to prevent recurrence of the non compliance: | |
| | |

Each page must be initialled by the person(s) who signs Section C of this AACR

Initial:



SECTION C

SIGNATURE AND CERTIFICATION

This Annual Audit Compliance Report (AACR) may only be signed by a person(s) with legal authority to sign it. The ways in which the AACR must be signed and certified, and the people who may sign the statement, are set out below.

Please tick the box next to the category that describes how this AACR is being signed. If you are uncertain about who is entitled to sign or which category to tick, please contact the licensing officer for your premises.

| If the licence holder is | | The Annual Audit Compliance Report must be signed and certified: |
|--|--|--|
| An individual | <input type="checkbox"/> <input type="checkbox"/> | by the individual licence holder, or by a person approved in writing by the Chief Executive Officer of the Department of Environment Regulation to sign on the licensee's behalf. |
| A firm or other unincorporated company | <input type="checkbox"/> <input type="checkbox"/> | by the principal executive officer of the licensee; or by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation. |
| A corporation | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> | by affixing the common seal of the licensee in accordance with the <i>Corporations Act 2001</i> ; or by two directors of the licensee; or by a director and a company secretary of the licensee, or if the licensee is a proprietary company that has a sole director who is also the sole company secretary – by that director, or by the principal executive officer of the licensee; or by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation. |
| A public authority (other than a local government) | <input type="checkbox"/> <input type="checkbox"/> | by the principal executive officer of the licensee; or by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation. |
| a local government | <input type="checkbox"/> <input type="checkbox"/> | by the chief executive officer of the licensee; or by affixing the seal of the local government. |

It is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give information on this form that to their knowledge is false or misleading in a material particular. There is a maximum penalty of \$50,000 for an individual or body corporate.

I/We declare that the information in this annual audit compliance report is correct and not false or misleading in a material particular.

SIGNATURE: _____

SIGNATURE: _____

NAME:
(printed) _____

NAME:
(printed) _____

POSITION: _____

POSITION: _____

DATE: ____/____/____

DATE: ____/____/____

SEAL (if signing under seal)



Decision Document

Environmental Protection Act 1986, Part V

Proponent: Inghams Enterprises Pty Ltd

Licence: L7477/2001/9

Registered office: 203 Northumberland Street
LIVERPOOL NSW 2170

ACN: 008 447 345

Premises address: Lot 68 on Diagram 98482
9 Baden Street
OSBORNE PARK WA 6017

Issue date: Thursday, 14 January 2016

Commencement date: Friday, 22 January 2016

Expiry date: Thursday, 21 January 2021

Decision

Based on the assessment detailed in this document the Department of Environment Regulation (DER) has decided to issue a licence. DER considers that in reaching this decision, it has taken into account all relevant considerations.

Decision Document prepared by: Gargi Joshi
Licensing Officer

Decision Document authorised by: Jonathan Bailes
Delegated Officer



Contents

| | | |
|---|--|----|
| 1 | Purpose of this Document | 2 |
| 2 | Administrative summary | 3 |
| 3 | Executive summary of proposal and assessment | 4 |
| 4 | Decision table | 5 |
| 5 | Advertisement and consultation table | 11 |
| 6 | Risk Assessment | 12 |
| | Appendix A | 13 |

1 Purpose of this Document

This decision document explains how DER has assessed and determined the application and provides a record of DER's decision-making process and how relevant factors have been taken into account. Stakeholders should note that this document is limited to DER's assessment and decision making under Part V of the *Environmental Protection Act 1986*. Other approvals may be required for the proposal, and it is the proponent's responsibility to ensure they have all relevant approvals for their Premises.



2 Administrative summary

| Administrative details | | |
|--|---|---|
| Application type | Works Approval <input type="checkbox"/> New Licence <input checked="" type="checkbox"/> Licence amendment <input type="checkbox"/> Works Approval amendment <input type="checkbox"/> | |
| Activities that cause the premises to become prescribed premises | Category number(s) | Assessed design capacity |
| | 15 | Not more than 50 000 tonnes per annual period |
| Application verified | Date: 17 November 2015 | |
| Application fee paid | Date: 10 December 2015 | |
| Works Approval has been complied with | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> | |
| Compliance Certificate received | Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> | |
| Commercial-in-confidence claim | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | |
| Commercial-in-confidence claim outcome | | |
| Is the proposal a Major Resource Project? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | |
| Was the proposal referred to the Environmental Protection Authority (EPA) under Part IV of the <i>Environmental Protection Act 1986</i> ? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | Referral decision No: Managed under Part V <input type="checkbox"/> Assessed under Part IV <input type="checkbox"/> |
| Is the proposal subject to Ministerial Conditions? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | Ministerial statement No: EPA Report No: |
| Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the <i>Environmental Protection Act 1986</i>)? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Department of Water consulted Yes <input type="checkbox"/> No <input type="checkbox"/> | |
| Is the Premises within an Environmental Protection Policy (EPP) Area | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | |
| Is the Premises subject to any EPP requirements? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | |



3 Executive summary of proposal and assessment

Ingham Enterprises Pty Ltd (Inghams) produces poultry products for the supermarket, food services and fast food industries and has operations in Australia and New Zealand. Ingham's operation at Osborne Park is an abattoir for processing chickens. The processing area comprises the following:

- Main factory building encompassing the live bird area, evisceration and the main production floor;
- Building to the north of the premises encompassing distribution and chilled storage area; and
- Boilers, wastewater storage tank, DAF plant (for wastewater treatment) and ice storage area are located in the centre of the complex.

The main factory building encompasses the live bird area, evisceration and the production floor. Distribution and chilled storage area are located to the north of the premises. The boilers, wastewater storage tanks, DAF treatment plant, ice bunker and ammonia storage are located at the centre of the premises. The premises holds Dangerous Goods licence DGS002668 for storage of 18.16kL of ammonia which is used for refrigeration purposes.

The premises was constructed approximately 40 years ago and is located in a light industrial area on the northern side of Baden Street in Osborne Park. Residential area adjoins the premises to the east, north east and south east. The nearest residents are within 250 metres of the premises boundary. There are no surface water bodies that intersect the premises. The abattoir operates from Monday to Friday with three shifts commencing on Midnight Sunday until 3 pm on Friday afternoon. The shifts include two processing and one cleaning shift.

Key emissions and discharges associated with premises activities include odour emissions and solid and liquid waste generation. This decision document has considered recent compliance history, complaints data and supporting information provided by Inghams to determine whether activities at the premises have significantly changed. Infrastructure/process upgrades completed at the premises till date have been considered in determining the need for additional regulatory controls. The licence is granted for the duration of 5 years.



4 Decision table

All applications are assessed in line with the *Environmental Protection Act 1986*, the *Environmental Protection Regulations 1987* and DER's Operational Procedure on Assessing Emissions and Discharges from Prescribed Premises. Where other references have been used in making the decision they are detailed in the decision document.

| DECISION TABLE | | | |
|----------------------------------|---|--|---------------------|
| Works Approval / Licence section | Condition number W = Works Approval L = Licence | Justification (including risk description & decision methodology where relevant) | Reference documents |
| General conditions | L1.2.1, L1.3.1-1.3.2 | <p><u>Emission Description</u> <i>Emission:</i> Emissions to stormwater from processing/ receival areas, and solid waste/ sludge storage area. Stormwater runoff from these areas may have elevated nutrients and biological oxygen demand. Runoff from chemical storage may be contaminated with hydrocarbons. <i>Impact:</i> Potential contamination of surrounding land and surface water drainage systems. The premises is located in a light industrial area. There are no surface water bodies in the vicinity of the premises. No major natural drainage channels intersect the premises. <i>Controls:</i> Process water from the bird handling and processing areas is diverted to the onsite DAF wastewater treatment plant. Filter cake (sludge) from the DAF plant is collected in a receival bin to minimise the potential for stormwater contamination and disposed of offsite. Stormwater collected from rooftops of the sheds and open bituminised/ concrete areas is diverted to the settlement pond on site.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Moderate</p> <p><u>Regulatory Controls</u> The licence does not authorise discharge of contaminated or potentially contaminated stormwater from the premises. General provisions of the EP Act and <i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i> will be applicable.</p> | - |



| DECISION TABLE | | | |
|---|--|--|--|
| Works Approval / Licence section | Condition number W = Works Approval L= Licence | Justification (including risk description & decision methodology where relevant) | Reference documents |
| | | <p>Other regulatory controls added to minimise potential for stormwater contamination are as below:</p> <ul style="list-style-type: none"> • Condition 1.2.1 has been included to ensure that spills of environmentally hazardous chemicals are recovered and disposed of appropriately. • Condition 1.3.2 specifies containment requirements for solid waste and sludge generated on the premises. • Condition 1.3.2 requires that wastewater treated on site is either disposed to Water Corporation's sewer or taken offsite to an authorised facility. • Condition 1.3.1 has been carried over from the previous licence and requires that contaminated or potentially contaminated wastewater is directed to the wastewater treatment system. <p><u>Residual Risk</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Rare <i>Risk Rating:</i> Low</p> | |
| Premises operation | L1.3.1- 1.3.2 | See General conditions section of the document for details. | - |
| | L1.3.3 | See Appendix A - odour emissions. | |
| Emissions general | L2.1.1 | No descriptive or numeric limits are included in the licence. No conditions are specified in this section. | - |
| Point source emissions to air including monitoring | - | <p><u>Emission Description:</u> <i>Emission:</i> Potential emission to air from natural gas fired boilers. Key combustion products associated with natural gas include carbon monoxide and nitrogen oxides (NOx). <i>Impact:</i> Nitrogen dioxide can be an odorous gas and an irritant. Carbon monoxide can be toxic to humans in high concentrations. The premises is located in a light industrial area. Residential areas adjoin the premises to the east, north east and south east. The nearest residential receptor is located less than 250 metres from the premises. The boilers are used in a batch process and the capacity of the boilers is smaller than the threshold defined for category 67 in Schedule 1 of the</p> | DER Guidance Statement: Licensing and works approval process, September 2015 |



| DECISION TABLE | | | |
|---|---|--|----------------------------|
| Works Approval / Licence section | Condition number W = Works Approval L= Licence | Justification (including risk description & decision methodology where relevant) | Reference documents |
| | | <p><i>Environmental Protection Regulations 1987</i> (EP Regulations). There is potential for limited impact. <i>Controls:</i> Only process controls. No end of pipe control measures.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Moderate</p> <p><u>Regulatory controls</u> No additional monitoring or reporting conditions are proposed. Other regulatory mechanisms such as Emission Estimation Techniques prescribed under the National Pollutant Inventory can be used to determine point source emissions during operations.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Moderate</p> | |
| Point source emissions to surface water including monitoring | - | There are no direct emissions to surface water. The previous licence did not authorise emissions to groundwater. DER has considered whether operations at the premises have changed; no significant changes have been identified. No new conditions have been specified. | - |
| Point source emissions to groundwater including monitoring | - | There are no direct emissions to groundwater. The previous licence did not authorise emissions to groundwater. DER has considered whether operations at the premises have changed; no significant changes have been identified. No new conditions have been specified. | - |



| DECISION TABLE | | | |
|--|--|---|---------------------|
| Works Approval / Licence section | Condition number W = Works Approval L= Licence | Justification (including risk description & decision methodology where relevant) | Reference documents |
| Emissions to land including monitoring | - | <p>There are no direct emissions to land. The previous licence did not authorise emissions to land. DER has considered whether operations at the premises have changed; no significant changes have been identified. No new conditions have been specified.</p> <p>Treated wastewater from the wastewater treatment plant (WWTP) is discharged to the Water Corporation's sewer. This discharge is not regulated through the licence. Solids input to the WWTP can impact odour emissions from the premises. See Appendix A for details of DER's risk assessment and decision making for odour emissions.</p> | - |
| Fugitive emissions | | <p><u>Emission Description:</u> <i>Emission:</i> Potential dust emissions associated with vehicle movement onsite. <i>Impact:</i> The premises is located in a light industrial area. Residential areas adjoin the premises to the east, north east and south east. The nearest residential receptor is located less than 250 metres from the premises. Fugitive dust emissions may impact amenity and cause nuisance or complaints. <i>Controls:</i> The areas used for truck movement and parking have concrete hard stand. Operators record dusty conditions in the Daily Environmental Checklist. Any windblown feathers are regularly collected and disposed of offsite.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Moderate</p> <p><u>Regulatory controls</u> No additional monitoring or reporting conditions are proposed. Fugitive emissions from the premises can be managed under general provisions of the EP Act.</p> | |



| DECISION TABLE | | | |
|---|---|--|----------------------------|
| Works Approval / Licence section | Condition number W = Works Approval L= Licence | Justification (including risk description & decision methodology where relevant) | Reference documents |
| | | <u>Residual Risk</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Moderate | |
| Odour | | See Appendix A- odour emissions for details of DER's risk assessment and decision making. | |
| Noise | - | The previous licence did not impose controls on noise. DER has considered whether operations at the premises have changed; no significant changes have been identified and no conditions have been included in this section. The <i>Environmental Protection (Noise) Regulations 1997</i> apply. | - |
| Monitoring general | - | No point source or ambient monitoring requirements are specified in the licence. No conditions are included in this section. | - |
| Monitoring of inputs and outputs | - | The premises is required to report on bird numbers processed during the annual period through the Annual Environmental Report submission process. No other input/ output monitoring conditions are considered necessary. | - |
| Process monitoring | - | The previous licence did not require process monitoring. DER has considered whether operations at the premises have changed; no significant changes have been identified and no conditions have been included in this section. | - |
| Ambient quality monitoring | - | The previous licence did not require ambient quality monitoring. DER has considered whether operations at the premises have changed; no significant changes have been identified and no conditions have been included in this section. | - |
| Meteorological monitoring | - | See Appendix A- odour emissions for details of DER's risk assessment and decision making. | - |
| Improvements | IR1 | An Improvement Requirement has been specified for the Licensee to investigate potential odour emission sources from the premises and provide respective management and operational control strategies. See Appendix A for details. DER will consider the outcome of the Odour Management Plan in determining future regulatory controls. | |
| Information | L3.1.1-3.1.4 L3.2.1-3.3.1 | Conditions 3.1.1 and 3.1.2 specifies record keeping requirements. Condition 3.1.3 requires submission of an Annual Audit Compliance Report. Condition 3.1.4 requires that a complaints management system is implemented. Condition 3.2.1 requires submission of an Annual | |



| DECISION TABLE | | | |
|---|---|---|--|
| Works Approval / Licence section | Condition number W = Works Approval L= Licence | Justification (including risk description & decision methodology where relevant) | Reference documents |
| | | Environmental Report. Notification requirements are specified in Condition 3.3.1. See Appendix A for details. | |
| Licence Duration | - | The premises is considered to pose a moderate risk. The licence is granted for a five year period. | DER Guidance Statement: <i>Licence Duration</i> , 2015 |



5 Advertisement and consultation table

| Date | Event | Comments received/Notes | How comments were taken into consideration |
|------------|--|--|--|
| 21/12/2015 | Application advertised in West Australian (or other relevant newspaper) | No comments received. | Not applicable. |
| 12/12/2015 | Application referred to interested parties listed: - City of Stirling | No comments received. | Not applicable. |
| 11/01/2016 | Proponent sent a copy of draft instrument | Proponent confirmed acceptance of proposed conditions. | Not applicable. |



6 Risk Assessment

Note: This matrix is taken from the DER Corporate Policy Statement No. 07 - Operational Risk Management

Table 1: Emissions Risk Matrix

| Likelihood | Consequence | | | | |
|----------------|---------------|----------|----------|----------|---------|
| | Insignificant | Minor | Moderate | Major | Severe |
| Almost Certain | Moderate | High | High | Extreme | Extreme |
| Likely | Moderate | Moderate | High | High | Extreme |
| Possible | Low | Moderate | Moderate | High | Extreme |
| Unlikely | Low | Moderate | Moderate | Moderate | High |
| Rare | Low | Low | Moderate | Moderate | High |



Appendix A

Odour Emissions

Emission description: Normal operation

Emission: Fugitive odour emissions are considered significant for abattoirs. Inghams have previously engaged a consultant to undertake an odour audit and dispersion modelling assessment at the premises. Key odour emission sources from the premises are considered to be as follows:

- DAF building (conveyor in DAF building and Balance tank on the WWTP);
- Effluent Holding tanks;
- Bird receival area;
- Scalding operations;
- Offal Hopper; and
- Blood tank.

Impact: DER's review of the report titled *Inghams Enterprises Pty Limited Odour Audit and Dispersion Modelling Assessment, Final Report, February 2008*, authored by 'The Odour Unit' identified that odour emissions from the premises are likely to impact on the surrounding area within an average 325m radius of the premises, including a residential zone.

The premises is located in a light industrial area on the northern side of Baden Street in Osborne Park. Residential areas adjoin the premises to the east, north east and south east. The nearest residential receptor is located less than 250 metres from the premises. This separation distance is less than that (500-1000m) recommended for abattoirs in DER's draft *Guidance Statement: Separation Distances, August 2015*. The previous environmental assessment report noted that the premises existed at its current location prior to residential development in the area.

The premises has a history of odour complaints. Review of recent complaints data received indicates that in the majority of cases, the premises operations were not confirmed to be the source of nuisance. DER records have identified four complaints received between 2011 and 2013 where activities such as WWTP maintenance, refrigerant leak, and use of inappropriate quantities of odour masking agents were identified as the root cause. These are not considered to be associated with 'normal operation' of the premises.

Review of complaints data from 2015 indicates that on nine different occasions between July 2015 and October 2015 odour-related complaints were received. On each occasion, a single complaint was received. On the majority of occasions, the DER investigation did not attribute the odour emissions to Ingham's operations.

The complaints data indicates that the premises activities may contribute to localised odour emissions, but they are not the single dominant source. The premises is located in an area where other operations with the potential to cause, or contribute to, odour emissions at receptors exist. Activities on the premises may contribute to localised, reversible impacts on amenity and local attention or complaints.

Controls: The following control measures are undertaken to minimise odour emissions:

- Installation of filter screen in the bird receival shed to reduce the solid waste loading in the WWTP;
- Agitation of balance tank contents to avoid anaerobic conditions;
- Installation of a solids press at the WWTP to reduce fugitive odour emissions;
- Collection of filter cake (sludge) from the DAF plant in a receival bin for disposal offsite;
- Enclosed blood containment tank;



- Application of negative pressure to the live bird holding area and use of deodoriser sprays at the bird receival shed. Birds are only held for a short period of time before slaughter;
- Installation of an automated live bird handling system (EasyLoad) to allow efficient and effective cleaning of the bird handling crates and modules;
- Ceasing onsite parking of live bird trucks, forklifts and equipment;
- Improvements to building floor walls and ceilings to enclose the building and upgrades to the air extraction system;
- Use of misting deodoriser in stacks prior to discharge to air and around open areas to reduce/mask odours;
- All solid waste is compressed and held in sealed industrial bins and removed by licenced waste removers daily;
- Regular offsite disposal of contents in offal bins; and
- Daily monitoring and recording at (8 am, 12 pm and 4 pm) of weather conditions (wind direction, wind speed and temperature) by means of an onsite weather monitoring station to help in validation or investigation of any complaints.

Risk Assessment

Consequence: Minor Likelihood: Possible Risk: Moderate

Regulatory Controls

Changes to operational and housekeeping practices and infrastructure upgrades (listed above) have been undertaken by the Licensee to manage odour emissions from the premises. It is noted that monitoring of odour complaints remains the primary mechanism to assess the ongoing efficiency of odour control strategies employed on site and no 'end of pipe treatment' such as the installation of biofilters to treat odorous gases has been considered.

DER will continue reviewing complaints received in relation to premises operations to determine whether additional odour controls are necessary. In the interim, the following licence conditions are considered appropriate to manage odour emissions risk from the premises:

- Condition 1.3.3 has been added requiring that the birds receival and processing areas are operated under negative pressure;
- Condition 3.1.4 has been added requiring that the licensee implements a complaint management system that records alleged source of the incident, wind direction, wind speed and temperature, actions taken including the outcome of any investigation. The condition also requires the licensee to undertake an annual analysis and review of complaints to identify root cause, any common factors and proposals to address issues identified;
- Condition 3.3.1 requires that the licensee notifies the CEO of any scheduled maintenance of the processing or wastewater treatment plant or any component of those plants that may causes or increase odour emissions from the premises.;
- Improvement requirement IR1 has been specified requiring identification of current odour sources on the premises, assessment of odour emission risk from identified sources during normal and upset conditions, details of management/ control measures to reduce odour emissions and identification of ongoing improvement measures to reduce odour emissions from the premises.

Condition 7(c) from the previous licence, which required the licensee to take measures to cease unreasonable odours from the wastewater treatment system has not been retained as it is acknowledged that premises also has other areas/ activities that may contribute to nuisance odour. The intent of this condition is addressed by conditions listed above. DER will consider the outcome of Odour Management Plan submitted by the licensee in determining future regulatory controls.

Residual Risk

Consequence: Minor Likelihood: Possible Risk: Moderate