



Application for Licence Amendment

Part V Division 3 of the *Environmental Protection Act 1986*

Licence Number	L8036/1993/7
Licence Holder	Western Meat Processors Pty Ltd
ACN	114 166 666
File Number	DER2015/000356-1
Premises	Cowaramup Abattoir 186 Saunders Road, Cowaramup, WA, 6284 Legal description – Lots 1 & 2 on Deposited Plan 76638 Certificate of Title Volume 1857 Folio 922 Certificate of Title Volume 1857 Folio 923
Date of Report	31 August 2022
Proposed Decision	Revised licence granted

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1. Decision summary

The Delegated Officer has determined to make amendments to Licence L8036/1993/7.

This Amendment Report documents the amendments made pursuant to section 59 and 59(B) of the *Environmental Protection Act 1986* (EP Act).

The decision report for the Existing Licence will remain on the department's website for future reference and will act as a record of the department's decision making.

2. Scope of assessment

2.1 Regulatory framework

In amending the Licence, the department has considered and given due regard to its Regulatory Framework and relevant policy documents which are available at <https://dwer.wa.gov.au/regulatory-documents>.

2.2 Amendment summary

Licence L8036/1993/7 is held by Western Meat Processors Pty Ltd (Licence Holder) for the Cowaramup Abattoir (the Premises), located at 186 Saunders Road, Cowaramup.

The Premises relates to the category 15 and the assessed production capacity under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) which are defined in existing Licence L8036/1993/7.

On 18 March 2022, the Licence Holder applied to the department to amend Licence L8036/1993/7 under section 59B of the *Environmental Protection Act 1986* (EP Act). This amendment relates to a proposed works to extend the existing tripe room, and associated wastewater emissions management.

Wastewater from the proposed extension to the tripe room will be directed to the existing wastewater treatment system. Waste solids and material that is not directed for human consumption will be disposed offsite.

In addition to the amendment outlined above, this amendment includes CEO initiated amendments relating to recommendations set out in the Nutrient and Irrigation Management Plan (NIMP) dated February 2022 (Table 1), as well as administrative amendments and the removal of the condition requiring the NIMP.

2.2.1 Proposed changes to tripe processing

The proposed amendment involves the redirecting of some paunch products to human consumption. Currently paunch, paunch contents, offal, and organs are either directed to the hopper/screw press or disposed of offsite. This amendment to tripe processing will see some paunch products (mountain chain, honeycomb, and tripe) recovered, washed and directed into the human consumption chain. These products will be packaged and refrigerated. Paunch will be initially handwashed and honeycomb and tripe will be then washed again in a tripe washing machine before packaging and refrigeration.

3. Risk Assessment

Based on the information provided, the proposed changes to paunch processing in the form of hand and machine washing, will result in approximately 2.3 kL of additional water use per annum. (approx. 33L/paunch). This increase in water usage is negligible and unlikely to result in an unacceptable increase in wastewater.

The amendment to the licence and paunch recovery process is considered to be acceptable as it is unlikely to lead to an increase in waste products, as previous material that was sent off site for disposal, such as tripe, mountain chain and honeycomb, is now being directed into human consumption. This change is likely to reduce the amount of waste produced.

Soil and groundwater quality monitoring to be specified to monitor potential impacts to soils within the irrigation area, groundwater beneath the irrigation areas or nearby surface water (existing dams on the premises and tributaries of the Caribunup River)

Reducing and further limiting the nitrogen loading limit to the irrigation areas will reduce the potential risk to soil, groundwater, and surface water.

A reduction and limit on the application of treated wastewater of 4mm/day to the irrigation areas will reduce the risk of surface water runoff impacting on nearby surface water and reduce the risk of soil degradation.

The addition of the applicant controls as per the recommendations set out in the NIMP and outlined in this amendment bring the risk from wastewater irrigated to land to an acceptable and manageable level.

The licence shall specify the requirements for the construction of the tripe room extension to ensure that excess wastewater that is produced through the washing of paunch etc. shall be directed to the existing wastewater system.

The extension of the tripe room is expected to result in a negligible increase in wastewater and will be connected to the existing infrastructure. Current controls to capture solid waste and the utilisation of paunch products for human consumption bring the risk of the tripe room to an acceptable and manageable level.

The Delegated Officer has deemed that the proposed Licence Holder controls along with the existing control in the licence bring the potential risks from the proposed tripe room extension and associated wastewater to a manageable and acceptable level.

4. Consultation

The Licence Holder was provided with the draft Amendment Report on 08 August 2022. Comments received from the Licence Holder on 31 August 2022 have been considered by the Delegated Officer as detailed in Appendix 1.

The Shire of Margaret River-Augusta (the LGA) was contacted to determine if any planning or development approvals are required for this application. The LGA advised the Department that planning approval will be required for this amendment. The Licence Holder is advised to seek the relevant planning approvals prior to commencing any works.

5. Decision

Based on the assessment in this Amendment Report, the Delegated Officer has determined that an amended licence will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

In addition to the amendment relevant to this application, the CEO has determined to further amend the licence in line with recommendations set out in the Nutrient and Irrigation Management Plan (NIMP) submitted to the Department on 25 February 2022 as part of

conditions 5 and 6 of L8036/1993/7. The Licence Holder has committed to implement the following, as per the NIMP recommendations:

- Reduction in total nitrogen loading in the irrigation area to 182kg/ha
- An application rate of no more than 4 mm/day in all irrigation areas to prevent surface water runoff.
- Installation of three (3) additional groundwater monitoring bores. Background bore up gradient of irrigation areas and two (2) located down gradient of Irrigation area 2 and 4.
- Two (2) groundwater monitoring events (GMEs) should be undertaken annually (winter and summer) over a five year period to determine nutrient fate and transport modelling.
- Annual soil sampling to be undertaken in each irrigation area for PRI and total nitrogen and phosphorous in the soil at 1 metre depths.

The recommendations outlined above and their implementation and incorporation into the licence was determined to reduce the risk profile of the premises by reducing nutrient loading within the irrigation areas, reducing the potential impacts from surface water run off and more adequately capture any potential impacts to soil and groundwater, outlined in Table 1.

The Delegated Officer has also determined the submitted NIMP meets the requirements set out in conditions 5 and 6 and as such these conditions will be removed from the licence.

5.1 Summary of amendments

Table 1 below provides a summary of the proposed amendments and will act as a record of implemented changes. All proposed changes have been incorporated into the Revised licence as part of the amendment process.

Table 1: Summary of licence amendments

Condition no.	Proposed amendments
<i>Condition 2 – Infrastructure table</i>	<i>Addition of tripe room and its operational requirements Amendments to irrigation area operational requirements</i>
<i>Condition 4</i>	<i>Change in total nitrogen loading limit</i>
<i>Conditions 5 & 6 – Nutrient and Irrigation Management Plan</i>	<i>Removal of Nutrient and Irrigation Management Plan conditions</i>
<i>New Condition 7</i>	<i>Addition of works condition – Installation of groundwater monitoring bores</i>
<i>New Condition 8</i>	<i>Addition of reporting requirement for groundwater bore construction</i>
<i>New Condition 9</i>	<i>Addition of reporting requirement for bore construction report</i>
<i>New Condition 10</i>	<i>Addition of works condition – Extension of tripe room</i>
<i>New Condition 11</i>	<i>Addition of reporting requirement for tripe room extension construction</i>
<i>New Condition 12</i>	<i>Addition of reporting requirement for tripe room construction report</i>

Condition no.	Proposed amendments
<i>Condition 13</i>	<i>Change in numbering and minor administrative amendment to condition</i>
<i>Condition 14</i>	<i>Change in numbering and minor administrative amendment to condition</i>
<i>New Condition 16, Table 6 – Addition of soil sampling</i>	<i>Addition of soil sampling locations in irrigation areas as per item 5 on Table 1 of NIMP</i>
<i>New Condition 17, Table 7</i>	<i>Addition of groundwater monitoring requirements</i>
<i>Condition 18</i>	<i>Change in numbering and minor administrative amendment to condition</i>
<i>Condition 19</i>	<i>Change in numbering and minor administrative amendment to condition</i>
<i>Condition 23</i>	<i>Change in numbering. Amendments and additions to Table 8, requirements for Annual Environmental Reports.</i>

References

1. National Uniform Drillers Licensing Committee 2020, *Minimum Construction Requirements for Water Bores in Australia (MCR)*, Braeside, Victoria
2. Department of Water and Environmental Regulation (DWER) 2006, *Water Quality Protection Note 30: Groundwater monitoring bores*, Perth, Western Australia
3. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.
4. DWER 2019a, *Amended Licence L8036/1993/7 and Decision Report for Western Meat Processors Pty Ltd*, revised 27 January 2021
5. DWER 2019b, *Guideline: Industry Regulation Guide to Licensing*, Perth, Western Australia.
6. Environmental Engineers International 2022, *Cowaramup Abattoir Nutrient and Irrigation Management Plan (NIMP)*, Perth, Western Australia
7. Western Meat Processors Pty Ltd 2022, *Application to transfer licence 8036/1993/7*, submitted 18 March 2022

Appendix 1: Summary of Licence Holder's comments on draft amendment

Condition	Summary of Licence Holder's comment	Department's response
2 – Infrastructure Table	The licence holder provided an updated premises map showing location of the tripe room extension.	The Department updated the licence with the new supplied figure.