



Amendment Notice #1

Licence Number L7279/1994/9

Licence Holder Westpork

ACN 009 148 879

File Number: DER2015/001853

Premises Martup Hills Piggery
Lot 4861 on Plan 227772
Gorn Road, Mokup 6394

Date of Amendment 30/01/2018

Amendment

The Chief Executive Officer (CEO) of the Department of Water and Environmental Regulation (DWER) has amended the above Licence in accordance with section 59 of the *Environmental Protection Act 1986* (EP Act) as set out in this Amendment Notice. This Amendment Notice constitutes written notice of the amendment in accordance with section 59B(9) of the EP Act.

Date signed: 30 January 2018

Paul Byrnes

**Manager, Licensing (Process Industries)
Regulatory Services (Environment)**

an officer delegated under section 20
of the *Environmental Protection Act 1986* (WA)

Amendment Notice

This amendment is made pursuant to section 59 of the *Environmental Protection Act 1986* (EP Act) to amend the Licence issued under the EP Act for prescribed premises as set out below. This notice of amendment is given under section 59B(9) of the EP Act.

Amendment description

The Licence Holder lodged a licence amendment application on 5 December 2017 seeking to amend the licence, following compliance with Works Approvals W5128/2012/1 and W5388/2013/1. In addition to the changes sought by the applicant, the Delegated Officer has taken the opportunity to remove superfluous conditions and provide a consolidated licence, incorporating all of the amendments since the licence was first granted.

Premises Description and Licence history

The Westpork Martup Piggery is a breeder only facility, keeping back some of the gilts each week for replacement. Pigs are reared in conventional sheds with slatted floors and flushed on rotation. At approximately 3 weeks of age (weaner stage), pigs are transferred off site to a grow-out facility.

W5128/2012/1:

Works approval W5128 granted on 30 March 2012 approved the construction of a farrowing shed, a covered anaerobic pond and an increase in the throughput of the piggery from 600 sows to 1,200 sows.

Westpork provided a partial compliance document, with all works completed apart from the cover on the anaerobic pond. The Licence was amended on 18 April 2013 to include updates and increase the assessed capacity to 4,700 animals at any one time.

W5388//2013/1:

Works approval W5388 granted on 30 May 2013 approved an increase in the capacity of the piggery to 8,324 animals (equivalent to 7,089 SPU) excluding suckers as a result of the construction of:

- 1 additional farrowing shed;
- 2 new dry sow sheds;
- 1 new effluent collection tank and an agitator;
- 1 additional anaerobic pond; and
- 1 additional evaporation pond.

A compliance document for W5388 was received on the 31 August 2015 but the licence was not amended to reflect the new infrastructure and the throughput was not increased as the primary pond cover proposed under W5128 had not been completed. On 18 April 2017, Westpork requested that the option to cover the anaerobic pond be relinquished as gas recovery was not economically feasible.

Current Amendment description

This licence amendment is for the following changes:

- (i) Increase in throughput from 4,700 animals to 11,500 animals or the equivalent of 8,671 SPU. The total number of animals includes suckers, as detailed in Appendix 4. The Applicant has made an allowance of 4% greater than average stock to allow for events such as public holidays and storms which may temporarily halt the transfer of stock from the piggery;

- (ii) An update to the map in Schedule 3 of the Consolidated Licence includes the additional infrastructure, as assessed under W5128 and W5388; and
- (iii) The piggery includes two anaerobic ponds, as shown in Schedule 3 of the Consolidated Licence. Effluent from the four original sheds and farrowing shed is directed to Anaerobic Pond #1. Effluent from the 3 sheds assessed under W5388 is directed to Anaerobic Pond #2.

Amendment history

Table 1 provides the history of licences and works approvals granted to Westpork for its Martup Hills Piggery since 2000.

Table 1: Licence amendments

Instrument	Issued	Amendment
L7279/1994/3	09/10/2000	Licence reissue to Select Pork
L7279/1994/4	09/10/2001	Licence reissue to Select Pork
L7279/1994/5	09/10/2002	Licence reissue to Select Pork
L7279/1994/6	09/10/2003	Licence reissue to Select Pork
L7279/1994/7	09/10/2004	Licence reissue to Select Pork
L7279/1994/8	09/10/2007	Licence reissue to Select Pork
L7279/1994/8	23/02/2012	Licence transfer to Westpork Pty Ltd
L7279/1994/9	08/10/2012	Licence reissue to Westpork Pty Ltd
W5128/2012/1	29/03/2012	Works Approval to construct farrowing shed and a covered anaerobic pond
L7279/1994/9	18/04/2013	Licence amendment to increase pig numbers to 4,700 animals
W5388/2013/1	30/05/2013	Works Approval to construct 3 conventional sheds and 2 wastewater ponds
L7279/1994/9	30/01/2018	Licence amendment to increase pig numbers to 11,500 animals (8,671 SPU) in a consolidated licence

Location and receptors

Table 2 lists the relevant sensitive land uses in the vicinity of the Prescribed Premises which may be receptors relevant to the proposed amendment.

Table 2: Receptors and distance from activity boundary

Residential and sensitive premises	Distance from Prescribed Premises
Residential dwelling	3.5km from activity boundary in a south easterly direction
Residential dwelling	3.8km from activity boundary in a westerly direction
Residential dwelling	3.6km from activity boundary in a north easterly direction
Beaufort River	5.5km north of the Premises boundary
Wetlands	Five wetlands are located within the Premises boundary, as detailed in Schedule 1 of the Consolidated Licence. These wetlands are not classified as <i>Environmentally Sensitive Areas</i> under the EP Act.
Groundwater	Groundwater is fractured rock, approximately 15 to 20 below ground level. The quality of the groundwater varies from marginal to saline.

Risk assessment

The additional infrastructure constructed under Works Approvals W5128 and W5388 were assessed when those approvals were granted. However, the increase in pig numbers proposed as part of W5388 was assessed on the basis that a cover would be placed on Anaerobic Pond #1 which would have significantly reduced odour emissions.

Westpork has requested an increase in pig numbers to 8,671 SPU with this amendment consistent with the assessed capacity under previous works approvals. The Delegated Officer has determined that an odour emission assessment will be required to ensure that odour emissions do not cause an unacceptable impact on nearby residential premises in the absence of a cover on Anaerobic Pond #1, as proposed in Works Approval W5128/2012/1.

Odour assessment

Odour emissions are a key issue for piggeries with the main odour sources being pig sheds, wastewater treatment systems and, in particular, anaerobic ponds. The National Environmental Guidelines for Piggeries (NEGP) recommends that the preferred approach for managing odour emissions is to ensure there is sufficient separation distance between the activity boundary containing all potential odour sources and the surrounding residential premises. The activity boundary has been outlined in Figure 2.

The amendment application included an assessment of odour emissions when holding 8,671 SPU. Monitoring of odour producing activities was carried out by Envall (Environmental Alliances Pty Ltd). The NEGP recommend various methods to determine if the separation distance is appropriate and the Envall assessment was conducted at Level 3 (refer to section 6.2 of NEGP) using site specific odour emission rates generated with an average of 4,700 animals on site at any one time. The monitoring included an assessment of the intensity of the odour emissions at a range of distances from their sources, with allowances made for wind direction, humidity, seasonal variations and ventilation (day or night).

Calpuff dispersion computer modelling was used to extrapolate and predict odour plumes at the increased throughput of 11,500 animals (8,671 SPU full carrying capacity) with the results provided in odour units (OU).

The NEGP notes that odour plumes can be measured in odour units (OU) being the recognised unit for measuring the concentration of odorous substances. The outcome of the monitoring and modelling shows that nearby residents will be outside of the 2.5 OU criterion contour, as shown in Figure 1. That is, there is sufficient separation distance between the piggery and nearby residential premises.

Figure 1: Predicted odour concentrations (OU) from Martup piggery against residential criteria (Westpark generated)

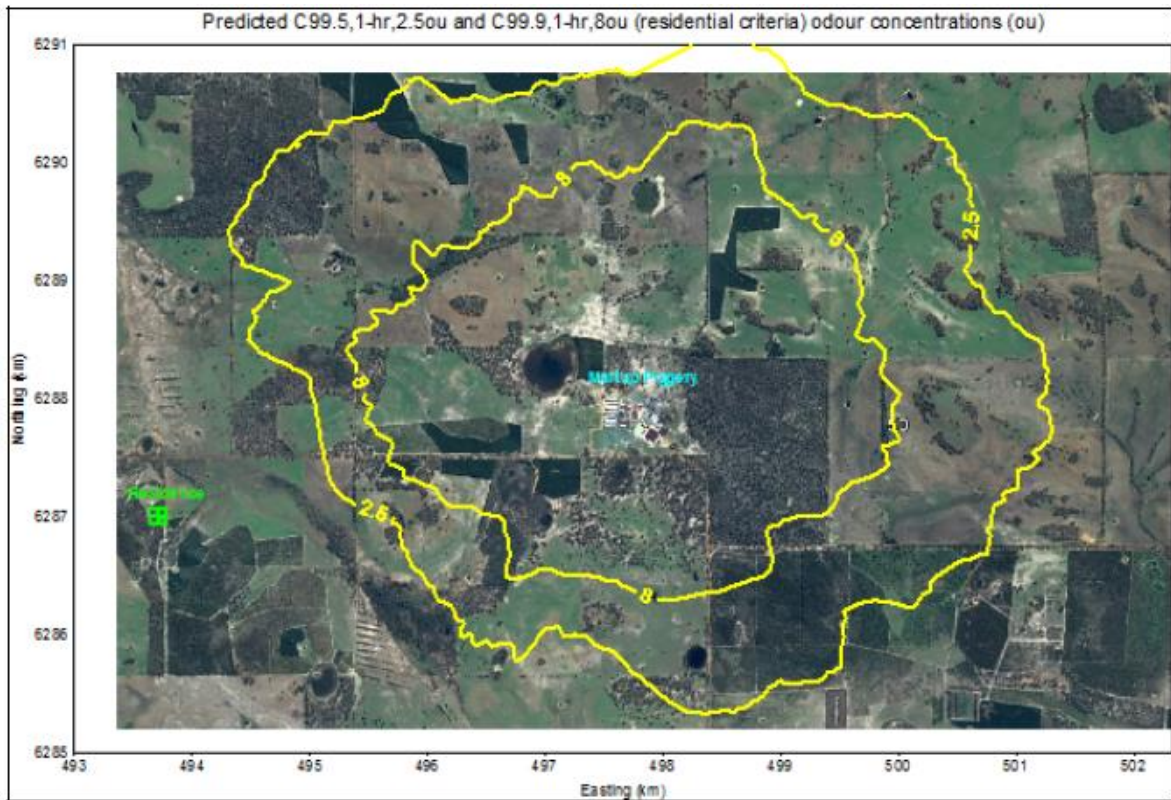
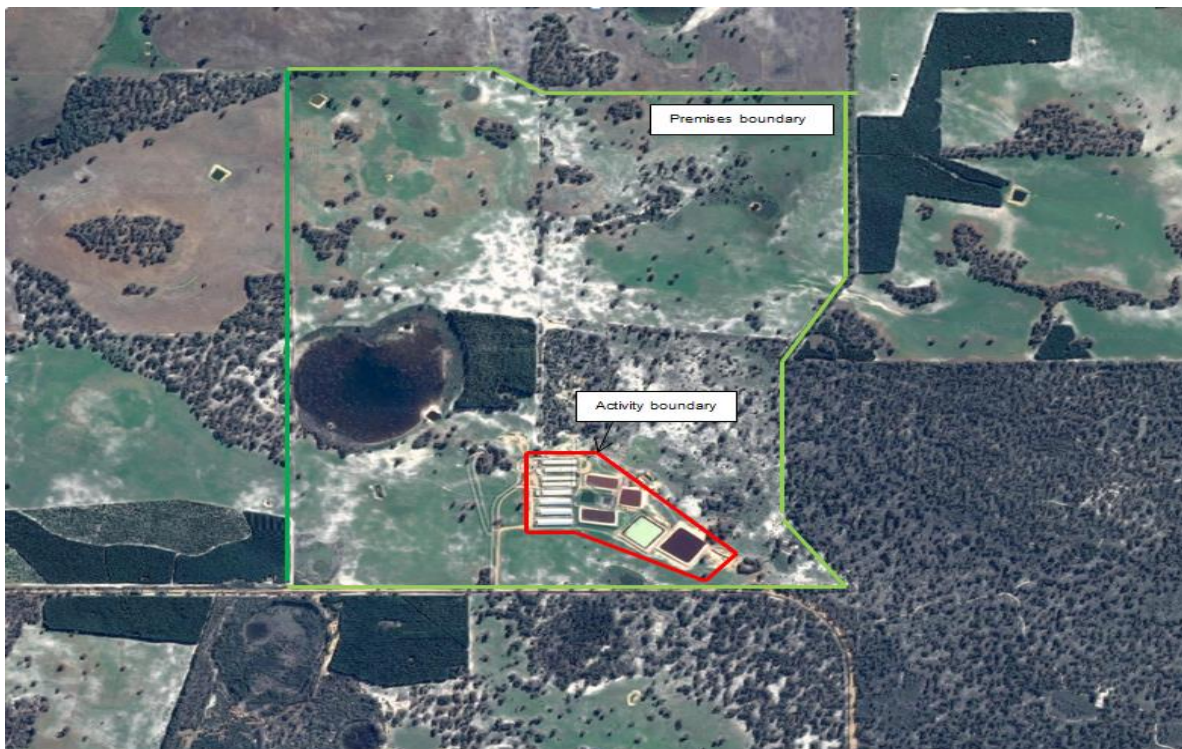


Figure 2: Premises and activity boundary (DWER generated)



Decision

The Delegated Officer has reviewed the information provided with the amendment application and the Applicant's assessment of the potential for unacceptable odour emissions. The odour assessment shows that there is an acceptable separation distance (determined at NEGP Level 3) between the activity boundary of the piggery and neighbouring residential premises.

The Delegated Officer has approved the Application by granting this Amendment Notice to give effect to an amendment to the conditions of the Existing Licence. Details of the amendment and the Consolidated Licence are set out in Appendix 2. This licence amendment will authorise the increase in pig numbers up to 8,671 SPU at any one time.

Attachment 1 contains a Consolidated Licence incorporating all of the amendments under this Amendment Notice and any other previous amendments to the licence.

Licence Holder's comments

The Licence Holder was provided with the draft Amendment Notice and draft Licence on 9 January 2018. The comments received from the Licence Holder on 25 January 2018 have been considered by the Delegated Officer as shown in Appendix 3.

Appendix 1: Key documents

	Document title	In text ref	Availability
1	Licence L7279/1994/9 – Westpork Martup Hills Piggery	L7279/1994/9	DWER records (A621966)
2	Westpork Pty Ltd, Martup Piggery – Licence Amendment Application, 623 Gorn Road, Mokup Report No: AP2017-101, V1. Prepared by Aurora Environmental, 29 November 2017	Licence Amendment Application	DWER records (A1573882)
3	Westpork Pty Ltd, Works Approval W5128/2012/1 – Westpork Martup Piggery	W5128/2012/1	DWER records (A489653)
4	Westpork Pty Ltd, Works Approval W5388/2013/1 – Westpork Martup Piggery	W5388/2013/1	DWER records (A636059)
5	Envall (Environmental Alliances) Martup Piggery, 623 Gorn Road, Mokup, Shire of East Arthur Prepared for Aurora Environmental, dated June 2017	Envall Odour Investigation	DWER records (A1573882)
6	National Environmental Guidelines for Piggeries, (Australian Pork Limited, 2010)	NEGP	https://www.environment.gov.au/system/files/pages/c7dc0bcb-56b7-41c0-9c66-69618c7dcad7/files/cfi-national-environmental-guidelines-piggeries.pdf
7	DER, February 2017. Guidance Statement: Decision Making. Department of Environment Regulation, Perth.	Accessed at http://www.dwer.wa.gov.au/	
8	DER, October 2015. Guidance Statement: Setting Conditions. Department of Environment Regulation, Perth.		
9	DER, February 2017. Guidance Statement: Risk Assessments. Department of Environment Regulation, Perth		

Appendix 2: Details of the Amendment, Part 1–Existing Licenced

Previous Licence Reference	Condition	Change	Comment
1.1.1	In the Licence, definitions from the Act apply unless the contrary intention appears.	Deleted	General template conditions that are not enforceable as they are not sufficiently clear or certain.
1.1.3	Any reference to an Australian or other standard in the Licence means the relevant parts of the current version of that standard.	Retained	Included in “Interpretation” part (d) of Consolidated Licence
1.2.1	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.	Deleted	General template conditions that are not enforceable as they are not sufficiently clear or certain
1.2.2	The Licensee shall provide to the Director prior written notice of any works it intends to undertake on the Premises that may: (a) cause any emission; (b) alter the volume, nature, location or source of any emission; (c) alter the method of detecting, monitoring or measuring any emission; or (d) involve the installation, alteration or replacement of any emission causing process equipment or industrial plant.	Retained and altered	The general requirements of this condition have been included as condition 2, Table 2, which authorises general emissions arising from Primary Activities associated with Category 2. Emissions not arising from Primary Activities are not authorised, as detailed in column 2 of Table 2
1.2.3	The Premises is the area defined in Table 1.2.3 (Premises location and description) and depicted visually in the Premises Map in Schedule 1.	Retained	The boundary for the Prescribed Premises has been included in Schedule 1 Maps in the Consolidated Licence
1.2.4	The Licensee shall maintain all pollution control and monitoring equipment to the manufacturer’s specification and any internal management system.		
1.2.5	The Licensee, except where storage is prescribed in section 1.3, shall only store more than 250 kg or 250 litres of any substance that is classed as dangerous goods below placard quantities or environmentally hazardous materials not classified as dangerous goods if: (a) they are stored in accordance with the Code of Practice for the Storage and handling of dangerous goods; and (b) if secondary containment is required by 1.2.5(a), it is constructed and maintained to: (i) contain not less than 110% of the volume of the largest storage vessel or inter-connected system; and (ii) contain at least 25% of the total volume of vessels stored in the compound; and (iii) have a low permeability (10^{-9} m/s or less).	Deleted	General template conditions that are not enforceable as they are not sufficiently clear or certain.
1.2.6	The Licensee shall immediately recover, or remove and dispose of spills or leaks of environmentally hazardous materials outside its storage vessel.		
1.2.7	The Licensee shall ensure that uncontaminated stormwater is kept separate from contaminated or potentially contaminated stormwater. Where stormwater has come into contact with a possible source of contamination, it should be treated as contaminated.		

Previous Licence Reference	Condition	Change	Comment
1.3.1	The Licensee shall ensure that all wastewaters from piggery operations including wash down water, by-products wastewater and contaminated run-off are directed to a wastewater treatment system.	Retained	Refer condition 3 Table 3 in the Consolidated Licence
1.3.2	The Licensee shall maintain an effective wastewater treatment system that shall include: (a) a solids separation system; (b) a physicochemical treatment system, to lower the concentration of phosphorus in the wastewater stream; and (c) an impervious pond system for treatment of wastewater to reduce nitrogen and biological oxygen demand levels.	Deleted	General template conditions that are not enforceable as they are not sufficiently clear or certain. Premises specific conditions are in condition 3 of the Consolidated Licence
1.3.3	The Licensee shall ensure that wastewater is only stored and/or treated within vessels or compounds provided with the infrastructure detailed in Table 1.3.3 (Containment infrastructure).		
1.3.4	The Licensee shall manage the wastewater treatment ponds such that: (a) a minimum top of embankment freeboard of 500mm is maintained; (b) storm water runoff is prevented from causing the erosion of outer pond embankments; (c) overtopping of the wastewater treatment ponds does not occur except as a result of an extreme rainfall event (greater than 1 in 10 year event of 72 hours duration); (d) vegetation and floating debris (emergent or otherwise) is prevented from encroaching onto pond surfaces or inner pond embankments; and (e) trapped overflows shall be maintained between treatment ponds to prevent carry-over of surface floating matter to subsequent ponds..	Retained	The requirements of these conditions have been included in condition 3 Table 3 in the Consolidated Licence
1.3.5	The Licensee shall ensure only treated wastewaters are disposed of via irrigation or evaporation or used for wash down		
1.3.6	The Licensee shall inform the Director at least three months before irrigating any treated waste water on the premises.		
1.3.7	The Licensee shall ensure all irrigation occurs according to an approved Nutrient Irrigation Management Plan.		
1.3.8	The Licensee shall ensure irrigation meets the following requirements: (a) irrigation does not occur in areas where the water table rises to within 1 m of the surface during the irrigation period; (b) bunding/cut-off drains are maintained adjacent to treated wastewater irrigation areas such that run-off only discharges to a designated location; (c) no irrigation generated run-off, spray drift or discharge occurs beyond the boundary of the Premises; (d) wastewater is evenly distributed over the irrigation area; (e) no soil erosion occurs; and (f) a healthy vegetation cover is maintained over the wastewater irrigation areas.	Deleted	Advice provided by Licence Holder in Licence Amendment Application that the wastewater treatment system is now a closed system, with no discharge to the environment

Previous Licence Reference	Condition	Change	Comment
1.3.9	The Licensee shall ensure that animal carcasses, spadeable animal material and other piggery solids are disposed of to a licensed rendering plant or to on-site burial pits.	Retained and altered	Refer condition 3 Table 3 in the Consolidated Licence
1.3.10	The Licensee shall ensure that where carcasses and spadeable animal materials are disposed of on-site that the: (a) carcasses and waste material are covered with at least 500 mm of soil immediately upon deposit; (b) burial sites are at least 300m away from watercourses and at least 50m away from nearest properties; and (c) number of animal carcasses buried is recorded for the duration of the licence.	Retained and altered	The intent of this condition has been included in condition 3 Table 3 in the Consolidated Licence apart for 1.3.10(c). The recording of animal carcasses buried on site is not required in the Consolidated Licence
1.3.11	The Licensee shall ensure that where application of piggery solids to land occurs on the Premises: (a) solids and sludge derived from the piggery shall be disposed of evenly by means of a mechanical spreader; (b) piggery solids shall only be applied to land that is a minimum of 1 metre above the winter groundwater table; (c) application of piggery solids shall be managed such that there is no runoff beyond the boundaries of the premises; (d) application of piggery solids shall not occur within 50 metres of any defined watercourse, wetland or external property boundary.	Deleted	Advice provided by Licence Holder in Licence Amendment Application that sludge from the sludge drying beds is dried and taken off site
1.3.12	The Licensee shall not apply any artificial fertilizer containing nitrogen or phosphorus within areas subject to treated wastewater irrigation or land application of piggery solids or sludges.		
1.3.13	The Licensee shall monitor and record, on a monthly basis, the number of sows and total number of pigs held intensively on site (monthly maximum).	Retained	Refer condition 9 Table 5. A monthly tally of pig numbers is a requirement of the Annual Environmental Report
2.1.1	The Licensee shall record and investigate the exceedance of any limit, and/or target in this section.	Deleted	General template conditions that are not enforceable as they are not sufficiently clear or certain.
2.2-2.4	There are no specified conditions relating to point source emissions to air, surface and groundwater in this section.	Deleted	Blank condition
2.5.1	The Licensee is permitted, subject to conditions in the Licence, to emit waste to land through the emissions points listed in Table 2.5.1 (Emission points to land) and identified in the Map of emission points in Schedule 1.	Deleted	Advice provided by the Licence Holder in the Licence Amendment Application notes that the wastewater treatment system is now a closed system, with no discharge to the environment
2.5.2	The Licensee shall target emissions to land at or below the levels specified in Table 2.5.2 (Emission targets to land).		
2.6	There are no specified conditions relating to fugitive emissions in this section.	Deleted	Blank condition
2.7.1	The Licensee shall ensure that odour emitted from the Premises does not unreasonably interfere with the health, welfare, convenience, comfort or amenity of any person who is not on the Premises.	Deleted	General template conditions that are not enforceable as they are not sufficiently clear or certain
3.1.1	The Licensee shall ensure that: (a) all water samples are collected in accordance with AS/NZS 5667.1; (b) all wastewater samples are collected in accordance with AS/NZS 5667.10;	Deleted	This condition refers to the sampling of wastewater prior irrigation on site. Information provided by the Licence Holder in the Licence Amendment

Previous Licence Reference	Condition	Change	Comment
	(c) all water samples are analysed in accordance with "Standard Methods for Examination of Water and Wastewater APHA-AWWA-WEF" [unless indicated otherwise in relevant table]; and (d) all samples are submitted to a laboratory with current NATA accreditation for the parameters to be measured [unless indicated otherwise in relevant table].		Application notes that the wastewater treatment system is now a closed system, with no discharge to the environment
3.1.2	The Licensee shall have all monitoring equipment referred to in any condition of the Licence calibrated in accordance with the manufacturer's specifications.	Deleted	General template conditions that are not enforceable as they are not sufficiently clear or certain
3.1.3	The Licensee shall, where the requirements for calibration cannot be practicably met, or a discrepancy exists in the interpretation of the requirements, bring these issues to the attention of the Director accompanied with a report comprising details of any modifications to the methods.	Deleted	
3.2-3.4	There are no specified conditions relating to monitoring of point source emissions to air, surface water or groundwater in this section.	Deleted	Blank conditions
3.5.1	The Licensee shall undertake the monitoring in Table 3.5.1 (Monitoring of emissions to land) according to the specifications in that table.	Deleted	This condition regulates the irrigation of treated wastewater to land. Advice provided by Licence Holder in Licence Amendment Application that the wastewater treatment system is now a closed system, with no discharge to the environment
3.6	There are no specified conditions relating to monitoring of inputs and process monitoring in this section.	Deleted	Blank condition
3.7.1	The Licensee shall undertake the monitoring specified in Table 3.7.1 (Monitoring of groundwater quality)	Retained and altered	Refer condition 4 Table 4 in the Consolidated Licence
3.7.2	The Licensee shall ensure that all groundwater sampling in Table 3.7.1 shall be conducted in accordance with AS/NZS 5667.11.	Retained	Refer condition 5 in the Consolidated Licence
3.8	There are no specified conditions relating to meteorological monitoring.	Deleted	Blank condition
4.1.1	The Licensee shall complete the improvements in Table 4.1.1 (Improvement program) by the date specified.	Deleted	Improvement requirement completed
5.1.1	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 5.1.1(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: (e) off-site environmental effects; or (f) matters which affect the condition of the land	Retained	Refer condition 6 in the Consolidated Licence

Previous Licence Reference	Condition	Change	Comment
	or groundwater.		
5.1.2	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.	Deleted	General template conditions that are not enforceable as they are not sufficiently clear or certain.
5.1.3	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 annual period.	Retained	Provision of an Annual Audit Compliance Report has been retained. Refer to condition 8 in Consolidated Licence
5.1.4	The Licensee shall implement a complaints management system that as a minimum records the number and details of complaints received concerning the environmental impact of the activities undertaken at the Premises and any action taken in response to the complaint.	Retained and altered	Refer to condition 7 in the Consolidated Licence
5.1.5	The Licensee shall ensure that the time, date and weather conditions, including wind direction, are taken and recorded at the time of the complaint.		
5.2.1	The Licensee shall submit to the Director at the Contact Address an annual environmental report within 28 calendar days after of the end of the annual period. The report shall contain the information listed in Table 5.2.1 (Annual Environmental report) in the format or form specified in that table.	Retained	Refer to condition 9 Table 5 in the Consolidated Licence
5.2.2	The annual environmental report shall also contain: (a) an assessment of the information contained within the report against previous monitoring results and Licence limits and/or targets; and (b) any original monitoring reports submitted to the Licensee from third parties	Retained and altered	Refer to condition 10 in the Consolidated Licence
5.3.1	Parameters listed in Table 5.3.1 (Notification requirements) shall be notified to the Director at the Contact Address and in accordance with the notification requirements of the table.	Retained and altered	Refer to condition 2 Table 2 in the Consolidated Licence

Details of the Amendment, Part 2–Consolidated Licence

Consolidated Licence Reference	Condition	Comment
1.	Maximum number of animals permitted to be held in the piggery	Number of animals held not to exceed assessed holding capacity
2.	This condition authorises emissions arising from the Primary Activities (Category 2) and excludes emissions which are not associated with the Primary Activities	Standard condition to be included in new licences
3.	The infrastructure and equipment associated with the Primary Activity have been detailed in Table 3	
4.	Monitoring of groundwater quality	Replaces former condition 3.7.1 of previous Licence except for Electrical Conductivity which has not been included as a parameter in the Consolidated Licence as the Delegated Officer considers the monitoring of total dissolved solids is sufficient.
5.	Groundwater sampling is to be conducted in accordance with AS/NZS5667.11	This condition replaces former condition 3.7.2 and is a standard requirement for groundwater sampling.
6.	Record keeping	This condition replaces former condition 5.1.1 and is a standard requirement for new licences
7.	Record of complaints	This condition replaces former conditions 5.1.4 and 5.1.5 of the previous licence. All piggeries have the potential to produce odour emissions. Condition 6 requires the Licence Holder to record any complaints received during the reporting period and actions taken in response to the complaint.
8.	Submission of an Annual Audit Compliance Report (AACR)	This condition replaces former condition 5.1.3 of the previous licence and an AACR is a standard requirement for all licences.
9.	Annual Environmental Report (AER)	This condition replaces former condition 5.2.1 of the previous licence. The provision of an AER is a standard requirement for all licences.
10.	Data provided in the AER	This condition replaces former condition 5.2.2 of the previous licence. The Licence Holder is required to list methods and procedures when monitoring is undertaken. Results are to be presented in a graphical format with a comparison against previous results and a discussion of any anomalies.
11.	Infrastructure and equipment associated with the Primary Activity are listed in Table 7	A list of all infrastructure and equipment is a standard requirement in new Licences.

Appendix 3: Summary of Licence Holder comments

The Licence Holder was provided with the draft Amendment Notice and draft Licence on 9 January 2018 for review and comment. The Licence Holder responded on 25 January 2018 and the following comments were received:

Condition	Summary of Licence Holder comment	DWER response
Condition 2 – Infrastructure and equipment – Table 3: Description of piggery sheds	All sheds to have a concrete floor and a <i>pull-plug system</i> to be deleted and replaced with a <i>flushing effluent removal system</i>	Description of piggery sheds updated
Condition 2 – Infrastructure and equipment – Table 3: Description of Sludge Drying Beds x 2	The requirement for the <i>hardstands to include a bund to contain leachate and prevent the egress of stormwater</i> to be deleted. Sludge drying is carried out in the old anaerobic ponds and not on a dedicated hardstand.	Description of Sludge Drying Beds updated
Condition 4 – Table 4: Monitoring of groundwater quality	Standing water levels to be measured <i>in metres at Australian Height Datum</i> . The monitoring bores on site have not been surveyed. Therefore, standing water levels are to be measured in metres below ground level (mBGL)	The Delegated Officer acknowledges that the measurement of standing water level in metres below ground level is suitable in determining any changes in groundwater levels.
Condition 9 – Record keeping	The Licence Holder to submit to the CEO an annual environmental report within 28 calendar days after the end of the annual period. The Licence Holder has requested that the reports be provided 60 days after the end of the annual period. This will allow sufficient time to collect and analyse results, collate the information and provide the report to the CEO.	The Delegated officer has approved the request to extend the period to 60 days after the end of the annual period.

Appendix 4: Proposed stock numbers

		Average Stock		Maximum stock (4% greater than average stock)	
Pig Class	SPU	Number of animals	SPU	Number of animals	SPU
Dry sows	1.6	2,374	3,798	2,469	3,950
Lactating sows	2.5	480	1,200	499	1,248
Boars	1.6	57	91	59	94
Gilts	1.8	293	527	305	549
Suckers	0.1	5,760	576	6008	601
Weaners	0.51	830	423	863	440
Porkers	1.08	485	524	505	545
Growers	1.48	485	718	504	746
Finishers	1.73	277	479	288	498
Total		11,041	8,336	11,500	8,671

Attachment 1: Consolidated Licence L7279/1994/9
