Decision Report

Application for a Licence

Division 3, Part V *Environmental Protection Act 1986*

Licence number	L2901/2025/1
Applicant	Kojonup Feeds Pty Ltd
ACN	159 025 233
Application reference number	APP-0026561
Premises	23368 Albany Highway, KOJONUP WA 6395 Legal description - Whole of Lot 1 on Deposited Plan 73131 As defined by the premises maps in Schedule 1 of the Licence
Date of report	18/03/2025
Status of report	Final

1. Purpose and scope of assessment

Kojonup Feeds Pty Ltd (Kojonup Feeds; the applicant) is seeking approval for a licence to operate Kojonup Feeds; an existing feed mill production facility (Kojonup Feeds; prescribed premises) with proposed infrastructure upgrades to increase production capacity. An application for a to licence was submitted under Division 3 Part V of the *Environmental Protection Act 1986* (EP Act) on 22 November 2024.

This report sets out the delegated officer's assessment of potential risk events arising from emissions and discharges that will be generated during operations at the premises.

In completing the assessment documented in this report, 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. Application details

Background

The feed mill was constructed in 2014 without a works approval.

On 17 October 2024, Kojonup Feeds met with the department to discuss regulation of Kojonup Feeds and the proposed upgrades. The department advised Kojonup Feeds to apply for a licence to authorise the existing operations and proposed works. This decision was made in consideration of the feed mill being built and already in operation.

Overview of existing premises

Kojonup Feeds is a Western Australian stock feed manufacturing facility located in Kojonup, about 40 km south-west from Katanning.

The prescribed premises existing operations manufactures about 35,000 tonnes per annual period (t/a) of ruminant stock feed and is proposing planned upgrades to operate at an increased design capacity.

The facility does not generate a wastewater stream. Water is collected from the roof tops of buildings at the premises, stored in tanks and used by the feed mill and around the site. As a result, the only potential emissions from the prescribed premises are noise, dust and odour. The following assessment is limited to the risks of the operation of Kojonup Feeds on residential receptors.

Table 1 describes the prescribed premises categories that the application is subject, as defined in Schedule 1 of the Environmental Protection Regulations 1987.

Table 1: Prescribed premises category

Classification of premises	Assessed design capacity (as per application)
Category 23: Animal feed manufacturing: premises (other than premises within category 15 or 16) on which animal food is manufactured or processed.	55,000 tonnes per annual period.

Feed Mill Existing Design and operation

The facility is in operation for 12 months of the year, for 5 or 6 days a week depending on seasonal demand. The feed mill's peak productivity is from January to June and is operated for 24 hours per day. The quieter period is generally from late winter to spring, a time when paddock feed is typically in sufficient supply.

The feed mill consists of the following infrastructure :

- A feed mill processing plant;
- Two LPG fired steam boilers and LPG storage tanks;

- Storage silos and sheds for raw materials and finished goods;
- Water storage tanks; and
- Surface water storage dam.

Feed Mill Proposed Upgrades

The upgrade works to increase the facility's production include:

- Replacing the No. 2 pellet press with an equivalent unit to the No.1 pellet press;
- Replacing the batching system with a new system with greater capacity
- Two additional 100 m^3 square, overhead finished goods storage silos adjacent to and similar to the finished goods storage silos.

3. Location and siting

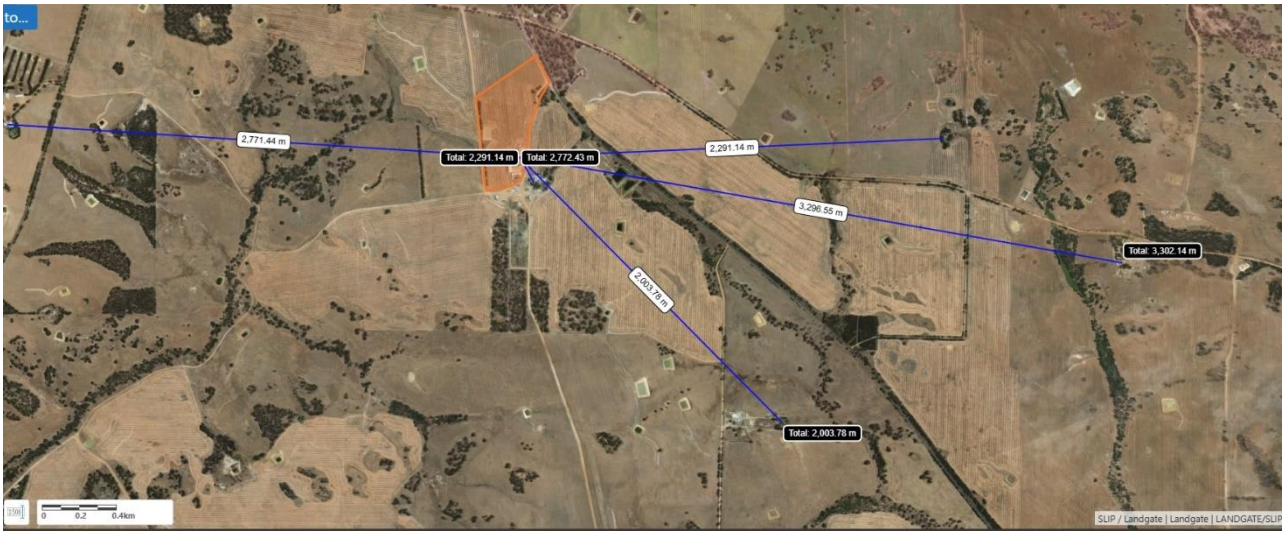
Siting context

The premises is located on farming land within the Great Southern region, about 20 km south of Kojonup on the Albany Highway. It is located within a rural zone of the Frankland River catchment and Blackwood River catchment, which has been largely cleared of native vegetation for crop and pasture production in dryland agricultural systems.

Separation distances

Kojonup Feeds nearest rural residential receptor is located about 150 m south-east from the premises operations, however a letter of support was provided to the applicant advising the dwelling is unoccupied and not fit for human habitation. There are about four rural residential receptors within a radial distance of about 2.2 km to 2.7 km from the premises operations (refer to Image 1 below). The next nearest receptors are at the Kojonup townsite, about 20 km north from the prescribed premises. There are no other industrial premises within a 5 km radius of Kojonup Feeds.

Image 1: Kojonup Feeds separation distances to nearby rural residential receptors (Geocortex Viewer for HTML5, 2025)



4. Other approvals

Planning approvals

A development application (DA) and a supporting information package were lodged with the Shire of Kojonup on 15 November 2024 for two new silos at Kojonup Feeds. The DA was granted in December 2024.

5. Consultation

The application was referred to the Shire of Kojonup and advertised for public comment on the department's website between 11 December 2024 and 1 January 2025. Correspondence dated 19 December 2024 outlined that the Shire of Kojonup granted the DA in December 2024 for two new silos at Kojonup Feeds.

No public submissions were received.

Applicant consultation

The licence holder was provided with a draft licence and decision report on 25/02/2025. The applicant provided comments to the department on 14 March 2025, which are summarised as follows:

- The applicant provided basic updates on the proposed and operational infrastructure within Table's 1 and 2 and the discharge points within Table 3. The table's and relative conditions within the licence, were updated accordingly to reflect the premises proposed and existing operations.
- The applicant provided an updated diagram schematic for figure 2 within the licence which was updated in the final licence.

6. Risk assessment

Determination of emission, pathway and receptor

The department assesses the risks of emissions affecting nearby receptors from the prescribed premises operations 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.

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.

Exclusions to this assessment (if relevant)

The following matters are out of the scope of this assessment and have not been considered within the risk assessment detailed in this report:

- other general farming activities being conducted on the premises and
- vehicle (i.e., livestock truck) movements on private or public roads

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 23: Animal feed manufacturing								
Construction								
Upgrade works: -two new silos steel fabrication of supporting structures for the new silos and the installation of prefabricated silos on site; and mechanical fitting of an upgraded batching system and replacement of pellet press (with higher capacity)	Dust and noise from installation/construction	Air/windborne pathway causing impacts to health and amenity. Construction works (earthworks) and installation of new infrastructure	Limited earthworks: the upgrade does not involve any civil or ground-disturbing works so it is expected minimal to no dust will be generated. New infrastructure put into service once installed. Short period of mechanical commissioning (a few weeks) to ensure the new plant is in the correct operational configuration. Silos will be prefabricated off-site. Fitting of the new batcher and press will be undertaken during the shutdown period. Sufficient separation distance from nearby rural residential receptors provided by the location of the feed mill. Location of feed mill is in a rural area.	Minimal impact to amenity at local scale **Slight**	Not likely to occur in most circumstances **Unlikely**	**Low** Acceptable, not controlled	The construction works for the upgrade of the feed mill are expected to generate minimal noise and dust. Emissions are expected to remain within the immediate vicinity of the feed mill and not expected to affect surrounding areas. The upgrades will not change the visual impact of the feed mill on neighboring properties or roads and are unlikely to impact nearby amenity. While the upgrades will slightly increase noise and dust emissions, it will be for a short duration and confined within the premises boundary. Based on this assessment, the Delegated Officer has determined no additional regulatory controls are required. The applicant's proposed controls have been accepted and works conditions outlining installation and design requirements have been included in the licence.	- Works conditions and table to include proposed infrastructure and installation/ design requirements
Operation								
Ingredient intake, handling, storage and transfer Feed processing and manufacturing Product storage and handling	Fugitive dust – receipt, handling, transport (trucks) and storage of solid materials Point source particulates – hammer mills and pelletising plant Odour Noise	Air/windborne pathway causing impacts to health and amenity. Trucks entering and leaving the facility Loading finished goods into truck Transfer and movement of raw materials from truck or storage sheds.	Sufficient separation distance from nearby rural residential receptors provided by the location of the feed mill. Location of feed mill is in a rural area. Two vehicle access pathways, one for heavy vehicle movements and one for light vehicle movements. Vehicles attending the property are generally spread throughout the day and there is not a peak hour for vehicles. Vehicles per hour would be below 10 trips per hour at all times. The feed mill does not use raw materials that might become mal-odorous (meat meal etc.). In general, the operation will not produce any offensive odour detectable within the general area of the feed mill – just the faint odour of cereal grain, fodder and hay. The pelletising plant has a cyclone to reduce particulate emissions. The hammer mills have a bag house to reduce particulate emissions.	Minimal impact to amenity at local scale **Slight**	Not likely to occur in most circumstances **Unlikely**	**Low** Acceptable, not controlled	Noise, odour and fugitive dust emissions from the animal feed manufacturing operations are expected to be minimal. Given the rural location of the premises and the distance between the operations and residential receptors, the likelihood of noise, odour and dust impacting the health and amenity of nearby residents is low. Additionally, the applicant's proposed controls have been reviewed and are considered acceptable. Based on this assessment, the Delegated Officer has determined that noise, odour and dust emissions from the premises is expected to be low risk. To ensure ongoing management of noise, odour and dust emissions, the Delegated Officer has incorporated the existing infrastructure into an operational requirements table, specifying that it must be maintained in accordance with the original design specifications.	- Infrastructure design and operational requirements table requiring all infrastructure to be maintained to design specifications
LPG Boilers X2	Point source emissions (gaseous emissions from running the boiler for longer times)	Air/windborne emissions to the environment Operation of LPG boilers	Sufficient separation distance from nearby rural residential receptors provided by the location of the feed mill. Location of feed mill is in a rural area.	Low level off-site impacts **Minor**	Not likely to occur in most circumstances **Unlikely**	**Low** Acceptable, not controlled	The applicant did not include quantitative data for the boiler, however the delegated officer was satisfied the risk of offsite impacts from boiler combustion emissions to air is low to negligible as the boiler is small-scale, gas-fired and common place technology for this type of feedmill operation. The delegated officer also noted receptors are distant and air emissions will be dispersed to atmosphere through a vent/stack at height. The licence will authorise air emissions from the boiler via the stack/vent with no further regulatory controls required	- Authorised discharge points table

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

8. Decision

Based on the risk assessment, the Delegated Officer has determined that emissions and discharges from existing feedmill facility and proposed site upgrades to 55,000 tonnes per annual period production capacity are low risk subject to the applicant's proposed controls which the delegated officer found to be appropriate. A key consideration is that the premises is appropriately sited and distant from residential receptors.

Based on the assessment outlined in this decision report, the Delegated Officer has determined that a licence will be granted, subject to conditions that align with the necessary controls for administration and reporting. These conditions, as outlined in the risk assessment table, have been determined in accordance with the *Guideline: Setting Conditions* (DWER 2020).

9. Conclusion

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

In accordance with the *Guidance Statement: Licence duration* (DER 2016), the duration of the licence will be 20 years.

10 References

1. **Department of Water and Environment Regulation** (2017). *Guidance Statement: Risk Assessments*, Perth, Western Australia.
2. **Department of Water and Environmental Regulation** (2019). *Guideline: Decision Making*, Perth, Western Australia.
3. **Department of Water and Environment Regulation** (2020). *Guideline: Setting Conditions,* Perth, Western Australia.
4. **Kojonup Feeds Pty Ltd** (2024). *Application Document and Supporting Information.* Received 22 November 2024, Perth, Western Australia.
5. **Shire of Kojonup** (2024). *E-mail dated* 19 December 2024*,* Stakeholder response*.*