Amendment Report

Application for Licence Amendment

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

Licence number	L7477/2001/9
Licence holder	Inghams Enterprises Pty Ltd
ACN	008 447 345
DWER references	2013/000044-1 APP-0026193
Premises details	9 Baden Street OSBORNE PARK WA 6017 Legal description – Lot 68 on Diagram 98482 Certificate of Title Volume 2172 Folio 927 As depicted in Schedule 1
Date of report	12/01/2026
Decision	Revised licence granted

1. Decision summary

This amendment report documents the assessment of potential risks to the environment and public health from the emissions and discharges during ongoing operation of the Inghams Enterprises Pty Ltd (the licence holder) abattoir at 9 (Lot 68) Baden Street, Osborne Park (the Premises). As a result of this assessment, amended Licence L7477/2001/9 (L7477) has been granted.

2. Scope of assessment

2.1 Regulatory framework

In completing the licence review documented in this report, the Department of Water and Environmental Regulation (DWER, 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 Overview of Premises

The premises has been operating since 1991 and is authorised to slaughter up to 50,000 tonnes per annum of birds (live weight) under L7477. On average this amounts to a production of approximately 37,500 tonnes of chicken meat per year and approximately 12,500 tonnes of animal bi-products.

Bi-products include heads, feet, feathers, blood and intestines which are transported offsite to a rendering plant for treatment where they are turned into saleable products such as tallow, meat meal for the pet food industry, and blood and bone fertilizer. In addition to these wastes, large amounts of wastewater are generated at the site. The abattoir wastewater effluent (wastewater) is high in Biological Oxygen Demand due to the presence colloidal suspended solids such as blood, fats, proteins, grease; Total Suspended Solids, Total Nitrogen, nitrogen and Total Phosphorus.

Untreated wastewater can cause blockages in municipal sewers, widespread odours and harmful gas build up in mains pipework and contribute to processing upsets for the biological wastewater treatment plants that service the community as a whole. Wastewater is required to be treated by the premises wastewater treatment plant to approved water quality criteria before being discharged to the sewer system.

2.3 Amendment summary

On 27 June 2024, the licence holder submitted an application to the department to amend L7477 to authorise an increased throughput of birds, and to include the operation of the Wastewater Recycling Treatment Plant (WRTP) onto the licence under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The construction of the WRTP was approved under works approval W6696/2022/1 (W6696). The request for an increased design capacity was withdrawn on 10 December 2025.

2.4 Overview of the Wastewater Recycling Treatment Plant

The WRTP is designed to accept all the wastewater produced by the plant's production process and to receive water from the uncovered bunded areas of the WRTP. The influent is pumped from an existing pit to the WRTP, through a rotary screen filter then pumped into the 3.0ML aerated mixing balance tank.

The filtered influent is then pumped to the Dissolved Air Filtration (DAF) plant to remove suspended solids, oils and other contaminants via the use of air bubble flotation. The solids are

removed and pumped into the 5kL sludge tank. The solids are then pumped through the dewatering screw press (DSP) and stored in a fully enclosed sludge skip bin. The waste will then be disposed of off-site.

After the DAF plant processes the effluent, it is then pumped through a series of pre & post-anoxic and aerator tanks before passing through the membrane bioreactor (MBR) to treat the effluent further by the process of microfiltration. Typically, the MBR permeate produced is considered to be of recycled water quality. The MBR permeate is then pumped to the Brackish Water Reverse Osmosis (BWRO) storage tanks via 5 & 1-micron filters and UV sterilisation. (See Figure 1. Description of wastewater system)

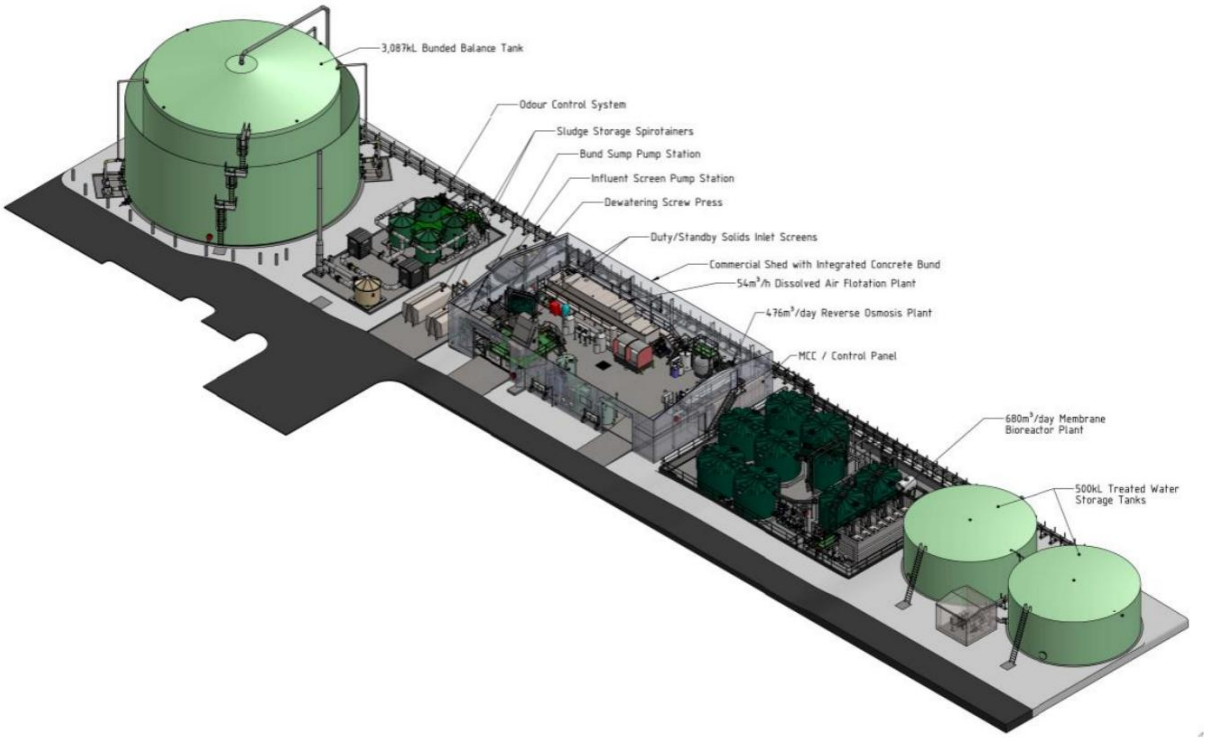

Figure 1. Description of wastewater system

The permeate is then pumped through a series of Reverse Osmosis (RO) membranes, the output of which is potable water quality. The water leaving the RO system is transferred to the two 500kL recycled water tanks, ready to be re-used in the production process

Foul air is extracted via ductwork that is extracting air from multiple sources (influent screen, pump station, balance tank, DAF, Sludge Tank & Sludge storage tanks). This foul air is forced through the biofiltration system where microorganisms consume odorous compounds. The biofilters are maintained under slight negative pressure by the induced draft (ID) fan. Treated air from the biofilters then passes through an activated carbon polishing filter to reduce the H_2S level below 0.1 ppm after which it is vented via 14m tall fibreglass reinforced plastic (FRP) stack to atmosphere at a velocity sufficient to disperse any remaining H_2S

2.5 Compliance (W6696)

The Licence Holder submitted the following reports in accordance with the requirements set out in W6696 for the construction and limited operation of the WRTP:

- Environmental Compliance Report and Critical Containment Infrastructure Reports for the construction of the WRTP;
- Noise and odour assessments conducted during Time Limited Operations; and the
- Report summarising the operations during Time Limited Operations.

The reports and supplementary information were submitted to the department by 18 November 2025 and assessed as complaint on 25 November 2025.

3. Risk assessment

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

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

3.1 Source-pathways and receptors

3.1.1 Emissions and pathways

The key emissions and associated actual or likely pathway during premises operation which have been considered in this decision report are detailed in Table 1 below. Table 1 also details the control measures the licence holder currently implements in controlling these emissions, where necessary.

Table 1: Licence holder's controls

Emission	Sources	Potential pathways	Licence Holder's controls (from application)
Operation			
Noise	Operation of Wastewater Recycling and Treatment Plant (WRTP) • enclosed biofilters, • sludge storage tanks, • dewatering screw press, • solids inlet screens, • Dissolved air flotation plant • reverse osmosis plant and • bioreactor	Air/windborne pathway causing impacts to health and amenity	• Noise bund of 1.8m L-shaped located next to the two treated water distribution pumps
Odour			• Wastewater processing vessels are either fully self-contained or fitted with an air extraction fans and ductwork to extract and convey process air through the Odour Control system. • Vessels fitted with air extraction hoods • Open vessels fitted with air extraction fans mechanisms and contained within the commercial shed • Odour control system consist of four biofilter units which contain microorganisms on biofilter media. • After the biofilters, all air is passed through an activated carbon H_2S scrubber before being discharged to the environment via a 14m stack • Biofilter will be monitored continuously for humidity, temperature and air flow rate • Monitoring of H_2S is undertaken at the outlet of the activated carbon filter.

Emission	Sources	Potential pathways	Licence Holder's controls (from application)
Contaminated water originating from: Untreated or partially treated wastewater discharge impacted by Total Dissolved Solids, Biological Oxygen Demand, and nutrients	Accidental discharge of partially treated effluent Effluent high in Biological Oxygen Demand, Suspended solids, Total Nitrogen and Total Phosphorus Leaks, spills and ruptures of liquid waste delivery lines Overtopping of tanks Failure of pumps	Overland flow and infiltration causing groundwater contamination and odour	• Tanks fitted with level control devices to continuously monitor levels • The self-bunded corrosion resistant steel and glass balance tank includes a corrosion resistant steel and glass tank bund with capacity to contain 110% of the balance tank, and fill sensors to raise an alarm when the fill level is reached. • Should the balance tank an alarm signals a shut-down of operations. • The alarm has a back level switch in case of failure of the primary alarm mechanism. • The commercial shed that contains the DAF plant, Rotary Screen, Bow screen. WRTP chemicals and Brackish Water Reverse Osmosis Treatment plant has a 200mm hob wall creating its own bund with concrete ramps and the volume of this bund is 110% of the largest tank in the shed. • Discharge to Water Corporation Sewer • Water Corporation regulates discharge criteria to sewer.
Odour from solid waste originating from: Dewatered solid abattoir waste Solids removed from wastewater via internally fed drum screen Solids removed from wastewater via polymerization and aeration in DAF plant	Odour from solids removed from WWTP	Air extraction for treatment through Odour Control System	• Solids removed from the internally fed drum screen are separated and dewatered and sent to a spirotainer for off-site disposal (this includes screenings from the wastewater and also solids generated from the cleaning of the drum. • Suspended solids removed from the wastewater via the polymerization and air suspension through the DAF plant are scrapped off the top of the water, dewaters and sent to a spirotainer for offsite disposal. • Sludge waste is dewatered and stored within self-contained spirotainers.

3.1.2 Receptors

In accordance with the *Guideline: Risk Assessment* (DWER 2020), the delegated officer has excluded the licence holder's employees, visitors, and contractors from its assessment. Protection of these parties often involves different exposure risks and prevention strategies and is provided for under other state legislation.

Table 2 below provides a summary of potential human and environmental receptors that may be impacted as a result of activities upon or emission and discharges from the prescribed premises *(Guideline: Environmental Siting* (DWER 2020)).

Table 2: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	**Distance from prescribed activity**
Residential premises	There are a number of residential properties immediately adjacent to the east premises: • 12 residential dwellings, closest ~105m north-east from WTRP shed, located at 9 Powell Street Osborne Park (Lot 10 on Plan 51925); • 10 residential dwellings, closest ~50m north-east from WRTP shed, located at 10 Powell Street Osborne Park (Lot 227 on Plan 302946); • 18 residential units, closest ~ 55m east from WTRP shed, located at 35 Main Street;(Lot 1 on Plan 48220); • 10 residential Units, closest ~ 95m east from WTRP shed, located at 27 Main Street (Lot 64 on Plan 34644); • Single residential dwelling located ~ 119m southeast from WRTP shed at 23 Main Street Osborne Park, Lot 3 on Plan 5901; and • 10 residential units, closest ~ 135m south-east from WTRP shed at 21 Main Street Osborne Park, (Lot 65 on Plan 34643)
Environmental receptors	**Distance from prescribed activity**
Specified Ecosystems	Herdsman Lake Regional Park 950m SW Environmentally Sensitive Area and a Bush Forever Site Threatened Fauna – Blue Billed Duck; Glossy Ibis; Carnaby Cockatoo Herdsman lake 1.3km south
Underlying groundwater (non-potable purposes)	City of Stirling groundwater area (superficial)

3.2 Risk ratings

Table 3 describes the risk events associated with operating the WRTP at the Premises. This is consistent with the *Guideline: Risk Assessments* (DWER 2020). In accordance with this guideline, the delegated officer has excluded the licence holder's employees, visitors, and contractors from its assessment. Protection of these parties often involves different exposure risks and prevention strategies and is provided for under other state legislation.

Where the licence holder has proposed mitigation measures/controls, these have been considered when determining the final risk rating. Where the delegated officer considers the licence holder'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 licence holder'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.

Licence L7477/2001/9 that accompanies this amendment report authorises emissions associated with the operation of the WRTP at the Premises. The conditions in the licence have been determined in accordance with *Guidance Statement: Setting Conditions* (DWER 2015).

Table 3: Risk assessment of potential emissions and discharges from the premises during operation

Risk Event					Risk rating[1] C = consequence L = likelihood	Reasoning	Justification for additional regulatory controls
Source/Activities	**Potential emissions**	**Potential pathways and impact**	**Receptors**	**Licence holder controls**			
Operation of wastewater recycling treatment and plant	Noise from operations	Air/windborne pathway via prevalent westerly winds causing impacts to health and amenity	Residential premises located approximately 2 km south-east of the Premises.	Noise bund of 1.8m L-shaped located next to the two treated water distribution pumps	**C: Minor** **L: Unlikely** **Risk: medium**	The Delegated Officer considers that the Licence Holder's controls for the mitigation of noise from operations of the WRTP are adequate. However, total noise from the operations at the Premises as a whole require further investigation.	The Delegated Officer considers the level of noise emissions generated by the WRTP are unlikely to negatively affect nearby receptors. However, a full-Premises validation of modelled noise emissions is required. Due to the potential risk of noise emissions from the Premises as a whole, the Delegated Officer has decided to include conditions 5 to 8 in the licence requiring measurements of emitted noise from the whole of Premises to validate those described in the modelled noise emissions.
	Odour			Wastewater processing vessels are either fully self-contained or fitted with an air extraction fans and ductwork to extract and convey process air through the Odour Control system. Vessels fitted with air extraction hoods Open vessels fitted with air extraction fans mechanisms and contained within the commercial shed Odour control system consist of 4 x biofilter units which contain microorganisms on biofilter media. After the biofilters, all air is passed through an activated carbon H_2S scrubber before being discharged to the environment via a 14m stack Biofilter will be monitored continuously for humidity, temperature and air flow rate The activated carbon filter will be monitoring for H_2S.	**C: Slight** **L: Unlikely** **Risk: low**	The Delegated Officer considers the Licence Holder's controls for odour emissions from the WRTP adequate.	The Delegated Officer considers the level of odour emissions generated by the WRTP are unlikely to negatively affect nearby receptors provided the licence holders controls are implemented. The Licence Holder's controls have been included in as operational requirements in condition 1.
Storage of dewatered solid abattoir waste Solids removed from wastewater via internally fed drum screen Solids removed from wastewater via polymerization and aeration in DAF plant	Odour from solids removed from WWTP			Solids removed from the internally fed drum screen are separated and dewatered and sent to a spirotainer for off-site disposal (this includes screenings from the wastewater and also solids generated from the cleaning of the drum Suspended solids removed from the wastewater via the polymerization and air suspension through the DAF plant are scrapped off the top of the water, dewaters and sent to a spirotainer for offsite disposal Sludge waste is dewatered and stored within self-contained spirotainers	**C: slight** **L: Rare** **Risk: low**	The Delegated Officer considers the Licence Holder's controls for odour emissions from solids generated from the WRTP adequate.	The Delegated Officer considers the level of odour emissions generated by the solid waste from the WRTP are unlikely to negatively affect nearby receptors. The Licence Holder's controls have been included in as operational requirements in condition 1.

Risk Event					Risk rating[1] C = consequence L = likelihood	Reasoning	Justification for additional regulatory controls
Source/Activities	**Potential emissions**	**Potential pathways and impact**	**Receptors**	**Licence holder controls**			
Accidental discharge of partially treated effluent Leaks, spills and ruptures of liquid waste delivery lines Overtopping of tanks Failure of pumps	Impacted untreated or partially treated wastewater discharge	Overland runoff potentially causing ecosystem disturbance or impacting surface water quality Infiltration to groundwater impacting on beneficial use of groundwater by nearby residential receptors	Herdsman Lake Regional Park 950m SW City of Stirling groundwater area (superficial) aquifer	Tanks to be fitted with level control devises to continuously monitor levels. These include ultrasonic level sensor, hydrostatic pressure transmitters level switches are to be fitted The main untreated waste water containment tank is the balance tank and this is fitted with a 110% bund, fill sensors to raise an alarm when a high fill level is reached. Should the tank overflow this triggers an alarm which is to be used to signal a shut-down of operations. The alarm has a back level switch in case of failure of the primary alarm mechanism. The commercial shed that contains the DAF plant, Rotary Screen, Bow screen. WRTP chemicals and Brackish Water Reverse Osmosis Treatment plant has a 200mm hob wall creating its own bund with concrete ramps and the volume of this bund is 110% of the largest tank in the shed. Discharge to Water Corporation Sewer Water Corporation regulates discharge criteria to sewer.	**C: slight** **L: Rare** **Risk: low**	The Delegated Officer considers that the Licence Holder's proposed controls for the storage of liquid waste, ensure there is a limited pathway, and therefore a low likelihood, for emissions to groundwater beneath the Premises. However, as a release of untreated or partially treated effluent is likely to create an odour issue, the Delegated Officer has included these controls in the licence.	The Licence Holder's controls have been included in as operational requirements in condition 1.

4. Consultation

The licence holder was provided with a draft amended licence and amendment report on 11 December 2025. Comments were received from the licence holder on 24 December 2025. The licence holder's comments, and the Department's response is documented in Table 4 below.

Table 4: Consultation

Condition	Comments received	Department response
N/A - Duration	Inghams would like DWER to consider a 20-year licence.	The Department agrees with the proposed 20-year extension of the licence. The amended licence expiry has been changed to 21 January 2047.
N/A – Licence History	The summary of licence history states that Inghams initiated the licence amendment to add the WRTP to the licence. However, as additional controls have been included by the Department, which is therefore inaccurate.	The Department agrees with the Licence Holders comment and has edited the Licence History to include the following statement: **CEO-initiated inclusion of additional odour and noise assessment conditions.**
Condition 1, Table 1	Item 2 – Red production area This item is in the LBHS, not in the red production area. As the unit is more than 20 years old, the maintenance requirements have been lost. Inghams have proposed the requirement wording is changed to "Feather/dust collector to be cleaned and maintained", and is moved to Item 3.	The Department accepts this change.
	Item 5 – Boiler rooms AS3814:2018 Amendment No. 1 (2025) was released in July 2025. Amendment No. 1 (2025) was released after the installation of the boilers and Inghams is not aware of any compliance requirement for this amendment.	The Department has removed all reference to Australian Standard (AS) 3814:2018 from the amended licence as this is currently regulated by Department of Local Government, Industry Regulation and Safety.
	Item 8 (a) and (b) – Wastewater Treatment and Recycling plant (WRTP) including odour control systems. a) As the system is mostly under negative pressure from the extraction fans it is leak free by design, the requirement should be removed or reworded to 'Odour extraction fans and associated conduits used to extract odour from the biofilters, influent screen, pump station, balance tank, DAF, Sludge Tank & Sludge storage tanks are to be	The Department accepts the proposed change to the wording of the requirements.

	maintained according to the manufacture's specifications'. b) The biofilters are rated to achieve a flow rate of 750m3/h and this is set by the fan speed. As the biofilters have variable differential pressures, the flow rates will vary and adjust with the fan speed. The flow rate is monitored and varied by a control system. Inghams have suggested that the requirement is removed or reworded to 'The biofilters are maintained to the manufactures requirements in order to meet the design criteria'	
	Item 9 – WTRP Wastewater treatment system. Inghams have commented that - a) Most of the treatment system is bunded and it is not reasonable to expect a plant to not have defects during normal operation. Inghams suggest that if this condition is considered justified, that it be re-worded: 'All wastewater storage and treatment tanks, vessels, transfer pipelines and conveyance infrastructure must be maintained to be impermeable to the environment. Leaks and defects will be rectified as soon as practical.' b) This is a duplication of a requirement by Water Corporation Trade Waste Permit No. 8. c) The maintenance of the alarm system to notify the operator of (i) Pump faults; (ii) High tank levels; and (iii) Tank overflows is not a requirement within the trade waste permit, but this does contain requirements to maintain the plant, which would include the alarm systems. This is also a duplication of authority as the operation and maintenance are part of the trade waste conditions and thus should be removed. d) Solid waste from the screens is not directed to the Spirotainer, it is collected in bins and tipped into the organic waste bins onsite. Only the sludge waste is	a) The Department accepts the proposed change to the wording of the requirement. b) The Department agrees with the Licence Holder. The requirement has been removed c) This requirement is directly related to risk to the environment and although the Water Corporation Trade Waste Permit No. 8 may refer to operation and maintenance, the specific reference to a maintained alarm is considered a control measure to manage risk to the environment. Therefore, the requirement will remain on the amended licence. d) The wording has been updated to reflect the correct description of waste directed to the spirotainers. The requirement has been reworded to: 'All sludge waste generated to be directed to the spirotainers'. e) The Department agrees with the Licence Holder. The requirement has been removed f) The requirement to maintain the noise barrier is not considered laboursome by the Department and it is also considered an important noise emissions control to manage excess noise to the surrounding environment. Therefore, the requirement will remain on the amended licence.

	dewatered and conveyed into the Spirotainer. e) The requirement for treated water distribution pumps and associated conduit to be maintained and checked for leaks presents low or no risk to the environment at all as the treated water is potable water. There is no difference in risk between this water supply and the water supply from the Water Corporation. f) The noise profile from the WRTP is compliant with the requirements of the Works Approval and therefore does not need further regulatory controls regarding maintenance of the noise barrier. This condition should be removed. g) and h) g and h should be combined together to state 'Treated wastewater can be discharged to the sewer, to an offsite licensed waste disposal facility or reused for the Wastewater recycling plant only. Treated wastewater is not permitted to be disposed of onsite by infiltration or irrigation'.	g) and h) The Department accepts the proposed change to the wording of the requirement.
	Item 10 – WTRP Brackish water reverse osmosis system Inghams disagree with the inclusion of the requirements: a) Filters regularly checked for effectiveness and replaced as necessary, and b) Maintained in accordance with the manufacturer's specifications Inghams have suggested these requirements are a duplication of ones they are already required to report upon to the Department of Health	The Department has removed requirement (a) from Item 10 of Table 1 as there appears to be an indirect duplication of reporting requirements with the Department of Health's requirements under Approval Number I78/00000. However, as the WTRP Brackish water reverse osmosis system forms a critical stage in the treatment of wastewater from the Premises, requirement (b) will remain on the amended licence.
	Item 11 – WTRP Recycled water reuse system Inghams have commented that the requirement for pumps and associated conduit to be maintained and checked for leaks and replaced as necessary presents no risk to the environment as the treated water is potable water. There is no difference in risk between this water	Agreed. The requirement has been removed

	supply and the water supply from the Water Corporation.	
	Item 13 – Chemical Store Inghams have commented that the daily monitoring of leaks/discharge of chemicals from containment vessels is unreasonable and does not correlate to the risk. The chemicals are stored in a bunded area designed to contain the largest container volume plus at least 10%. Inghams have suggested the frequency changed to weekly.	The Department agrees with the Licence Holder. The wording has been updated to reflect the change to the frequency of monitoring. The requirement has been reworded to: Weekly monitoring of leaks/discharge of chemicals from containment vessels
	Item 15 – Stormwater Inghams have noted that they undertake monthly inspections of the stormwater gross pollution trap (GPT) system, being the stormwater inlet filter baskets. Inghams have suggested combining the requirements of (a) and (b) to a requirement that reads: 'Monthly inspections, cleaning and maintenance of the stormwater drains and filter basket traps'.	The Department accepts the proposed change to the wording of the requirement.
Condition 2, Table 2	Inghams considers that all waste management related to the license should be covered in Table 2 to simplify the process. In addition to this, Inghams suggest the 'specific requirements' of items 2 and 3 of Table 2 be removed.	Table 1 sets out the requirements for waste to be removed from the respective areas to waste containment vessels. Whereas Table 2 sets out the requirements for the disposal of treated wastewater, sludge, and solid waste generated on the Premises. However, it is recognised that Table 2 includes some unnecessary duplication. As such the Department has removed the 'specific requirements' for items 2 and 3 of Table 2. In addition to this, the department has identified that Table 1, Item 12, requirement c regarding the off-site transportation of solid waste is similar to that of the disposal strategy requirements of Table 2, Item 2. Therefore, the department has removed the requirement of Table 1, Item 12, requirement c. To clarify the meaning of solid waste, the department has updated the 'Definitions' table of the amended licence to include the definition of 'solid waste'. The definitions table will now state that 'solid waste' means all solid waste generated from the white production area, red production area, LBHS, spin chillers, processed animal waste from the

		dispatch area, and solid waste from the screens of the waste water treatment system.
Condition 4, Table 3	Inghams have noted a typographical error in the numbering, such that this condition should have been numbered '3' rather than '4', and there has been an error in the information copied into this table which needs to be rectified. The testing schedule should be changed to annually, which is consistent with industry standards for biofilter and activated carbon-based odour control systems. Inghams have also requested the frequency be reduced to biannual thereafter.	The typographical error and transfer of information in the table have been acknowledged and rectified. The department agrees with changing the sampling frequency for odour concentration and odour emissions rate from monthly to annually. This is based on the ongoing requirement for continuous H_2S monitoring. Biannual monitoring of odour concentration and odour emissions rate may be considered in a future amendment of the licence.
5-8 (Noise Monitoring)	*N/A*	Title changed to 'Noise Assessment' to correctly reflect the requirements of Conditions 5-8

	Inghams does not consider the inclusion of the noise assessment conditions as they consider it to be: a) not consistent with the operation of the WRTP, b) is selective in risk evaluation. The justification by the delegated officer is that there is a potential risk of noise emissions from the premises as a whole. However, this assessment does not include the additional noise controls that Inghams has installed on major noise sources across the whole site, as these have been completed outside of the works approval for the WRTP. It is considered that if the whole site is being considered as a risk, then all completed mitigation measures should be included in the assessment, c) is based on a risk perceived by the delegated officer, rather than based on the evidence, and *d)* a level of regulatory condition setting that is inconsistent with the DWER guidelines (DWER, 2015) as DWER has added license conditions and regulatory interventions that are more consistent with an assessment of high residual risk (DWER, 2025).	The noise assessment (conditions 5 - 8) requires the Licence Holder to undertake a whole-of-Premises noise assessment. This requirement originates from the findings of an actual and modelled noise emission assessments from the plant which were commissioned by Inghams and documented in reports titled 'Acoustic Report for Osborne Park Primary Processing' dated 17 November 2023 and 17 May 2024, and a report titled 'Environmental Noise Impact Assessment of Wastewater Treatment and Recycling Plant', dated 3 October 2025. The report dated 17 November 2023 included Premises noise measurements undertaken on 12 September 2023 and the modelling of these measurements against the Environmental Protection (Noise) Regulations 1997. The report concluded that compliance with the Regulations was not achieved for the operation of Poultry Processing Plant (PPP) at that point in time. The report included noise control options. The report dated 17 May 2024 did not include actual noise measurements. The report was developed to document modelled noise measurements following the inclusion of the Water Recycled Treatment Plant (WRTP) and the proposed noise control options. The report concluded that predicted noise reduction would likely be significant, however the proposed noise controls are unable to achieve compliance at some receiver locations for the worst-case operation of Poultry Processing Plant and Water Recycled Treatment Plant on the Inghams Premises. The report dated 3 October 2025 included Premises noise measurements undertaken on 21 February 2024 and then modelled these measurements against the Environmental Protection (Noise) Regulations 1997. The report was commissioned to undertake a noise assessment of the WRTP in isolation. The purpose of the report was to comply with conditions set out in Works Approval (W6696/2022/1). The report concluded that the predicted worst-case WRTP noise emission is much lower than the PPP noise emission and will be masked/inaudible at all of the closest receivers. However, the report stated that the noise emissions from the operation of

		the WRTP was fully compliant with the Works Approval conditions. The Department considered the report suitable for addressing the Works Approval conditions related to noise emissions from the WRTP. It is noted that the report was not intended to assess noise emission from the whole-of-Premises. To date, a report has not been provided to the Department which includes a whole-of-Premises actual noise measurements and assessment to confirm whether the noise control measures implemented by Inghams which include acoustic barriers, rapid close roller doors, refurbishment of the live bird holding shed, acoustic blankets around condensers, etc have resulted in compliance with the Environmental Protection (Noise) Regulations 1997. Therefore, Conditions 5 – 8 will remain on the licence as a report with actual noise measurements and assessment is required to demonstrate the effectiveness of the noise control measures as a means to comply with the Environmental Protection (Noise) Regulations 1997 for the whole-of-Premises noise emissions.
Condition 9, Table 4	Inghams do not consider reporting every malfunction of the wastewater treatment system is feasible or relevant to environmental performance. Inghams consider that reporting these minor issues is not practical and only significant breakdowns that have an impact on odour or the environment should be reported. They have proposed a rewording from 'Any malfunction of the wastewater treatment system' to 'Any Critical malfunctions in the Wastewater treatment plant creating odour or environmental impacts'	Agreed. The wording has been updated.
N/A - Risk Assessment table of the Amendment Report	Inghams does not agree with the Department's risk assessment rating of 'medium risk' as the odour assessment reports completed during the Limited Time Operation (LTO) indicated a low risk.	The Department has acknowledged that with exclusion of the odour exceedance identified in May 2025 from the WRTP, all other odour measurements have been below the designated assessment levels. Therefore, the risk criteria have been amended to a consequence of slight and a likelihood of unlikely, resulting in a risk level of 'low'. The wording of the 'Justification for additional regulatory controls' has been amended to: The Delegated Officer considers the level of odour emissions generated by the

		WRTP are unlikely to negatively affect nearby receptors ***provided the licence holders controls are implemented***.
	Inghams does not agree with the Department's inclusion of noise monitoring. Inghams note that the noise control walls were not included in the risk assessment.	Please see above comments related to Conditions 5-8.

5. Conclusion

Based on the assessment in this decision 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.

References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia. Accessed from www.dwer.wa.gov.au
2. Department of Water and Environmental Regulation (DWER) 2019, *Guideline: Industry Regulation Guide to Licensing*, Perth, Western Australia. Accessed from www.dwer.wa.gov.au
3. DWER 2020, *Guideline: Environmental Siting*, Perth, Western Australia. Accessed from www.dwer.wa.gov.au
4. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia. Accessed from www.dwer.wa.gov.au
5. Inghams Enterprises Pty Ltd, 27 June 2024, Licence Amendment Application
6. Department of Health July 2024, Recycled Water Scheme Approval (Approval Number I78/00000, File No. F-AA-91487)