



Application for Licence Amendment

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

Licence Number	L8613/2011/3
Licence Holder	Ausvision Rural Services Pty Ltd
ACN	009 070 624
File Number	FA265424
Premises	Hillside Meat Processors 148 Boxsell Road NARROGIN WA 6312 Legal description – Lot 50 on Diagram 80743 Lot 6 on Plan 233183
Date of Report	24/04/2023
Decision	Revised licence granted

Table of Contents

1. Decision summary	3
2. Scope of assessment	3
2.1 Regulatory framework	3
2.2 Application summary and overview of premises	3
2.2.1 Existing abattoir operations	3
2.3 Amendment application	4
2.3.1 Category 83: Fellmongering	4
2.3.2 Outdoor holding pens	4
3. Risk assessment	5
3.1 Source-pathways and receptors	5
3.1.1 Emissions and controls	5
3.1.2 Receptors	6
3.2 Risk ratings	7
3.3 Department review on application for fellmongering	9
3.4 Department review on application for outdoor holding pens	9
4. Consultation	13
5. Decision	13
5.1 Category 83: Fellmongering	13
5.2 Outdoor holding pens	13
5.2.1 Outdoor holding pens 1 - 10	13
5.2.2 Outdoor holding pens 11 - 14	14
5.3 Administrative amendments	14
References	15
Appendix 1: Summary of licence holder's comments on draft licence and decision report	16
Table 2: Licence holder controls (from application)	6
Table 3: Sensitive human and environmental receptors and distance from prescribed activity	7
Table 4: Risk assessment of potential emissions and discharges from the premises operation	8
Table 5: <i>National procedures and guidelines for intensive sheep and lamb feeding systems</i> (Guideline) recommendations against the proposed licence holder controls	9
Table 6: Consultation	13

1. Decision summary

This amendment report documents the assessment of potential risks to the environment and public health from proposed changes to the emissions and discharges during the operation of the premises. This amendment report documents the amendments made pursuant to section 59 and 59(B) of the *Environmental Protection Act 1986* (EP Act).

The delegated officer has determined to grant some amendments to licence L8613/2011/3 to authorise fellmongering operations and the use of outdoor lairage yards. These amendments are subject to conditions commensurate with the determined controls and reporting requirements necessary for administration of the licence, as presented in this amendment report. The delegated officer has determined to refuse some amendments.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this amendment report, the Department of Water and Environmental Regulation (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 Application summary and overview of premises

Licence L8613/2011/3 is held by Ausvision Rural Services Pty Ltd (licence holder) for Hillside Meat Processors, located at 148 Boxsell Road, Narrogin WA 6312 (the premises).

Hillside Meat Processors is a Category 15: Abattoir premises that is subject to licence L8613/2011/3 for the assessed production capacity of 16,200 liveweight tonnes per annual period (sheep and goats). On 4 October 2022, the licence holder submitted an application to the department to amend licence L8613/2011/3 under section 59 and 59B of the EP Act. The application seeks to include onto the licence:

- 1) Category 83: Fellmongering (skin salting) operations; and
- 2) approval to use fourteen outdoor holding pens for the purpose of 'lairage' (holding sheep prior to their slaughter)

2.2.1 Existing abattoir operations

The premises consists of the abattoir infrastructure being the slaughter area, offal area, lairage, de-boning area and cold storage. All wastewater generated from the abattoir is discharged to the pond-based wastewater treatment system (WWTS) (see figure 3 of the licence).

Livestock (sheep and goats) are delivered to the premises into the covered lairage shed and adjoining outdoor uncovered lairage yards. Wash water generated from the covered lairage shed is directed into the WWTS through a solids separator. Offal and blood are taken off-site for processing and or rendering. Manure and paunch material is stored within the Manure Paunch and Material Storage, adjacent to the solids separator, which is removed offsite monthly. Mortalities unsuitable for processing and paunch is authorised to be buried onsite in designated clay lined carcass pits.

The WWTS consists of six clay lined ponds: 2 anaerobic ponds, 2 aerobic ponds and 2 evaporation ponds. Treated wastewater from the final pond is irrigated across two irrigation areas totalling 37 hectares. An annual hay crop is harvested from the irrigation areas as a means of exporting nutrient from the site.

2.3 Amendment application

2.3.1 Category 83: Fellmongering

Skins are a by-product of the meat processing operation onsite. To prevent rot and odour emissions, the licence holder proposes to process the skins onsite.

The number of skins processed yearly is dependent on the number of animals being processed onsite. As such, the licence holder has stated that an average of 600,000 skins are processed per annual period but could go up to 900,000 when demand rises. Each skin is salted with 2 kg of salt. The skins are then pressed and packed into pallets and temporarily stored in the skin shed pending the weekly removal offsite. Some salt falls on the concrete floor of the skin shed, which is reused until deemed too dirty to do so. When considered waste, the salt is disposed into a skip bin for offsite disposal.

The application stated that it is estimated that an average of 200 L of liquid waste is produced daily from this fellmongering process, with some liquids running off from the pallets during storage, but no justification for this estimated volume was provided. The pallets are stored on a concrete floor graded towards a small inlet discharging to a concrete collection sump. Overflow from this sump is discharged to another sump fitted with a pump (discharge pump). The department noted that these liquid wastes were being discharged into the WWTP which goes against industry best practice and must therefore be managed separately to other streams of wastewater. The licence holder now proposes that the liquid wastes from the discharge sump be pumped into impervious containment vessels, which when full, will be disposed of offsite to a licensed waste facility via controlled waste carrier.

2.3.2 Outdoor holding pens

The premises has constructed and operated fourteen outdoor holding pens not authorised by a works approval or licence. The pens are constructed with in-situ soils and little to no wastewater or contaminated water drainage and are shown highlighted in red in Figure 2.

The licence holder has advised that pens 1 to 6 have runoff discharged through a solids screen prior to being discharged through a pipe through the solids separator before being discharged into the abattoir WWTP while pens 11 to 14 have runoff discharged to the bushland located down-gradient of these pens.

Runoff from pens 11 to 14, would flow as uncontrolled overland runoff to the Threatened Ecological Community (TEC) bushland located immediately west of these pens. The licence holder states that these pens are not occupied during the rainfall season (May to August) and have manure removed via a bobcat in April each year.

. Leachate and contaminated stormwater runoff management from the proposed outdoor holding pens is shown in Figure 1 and further detailed below in table 2.

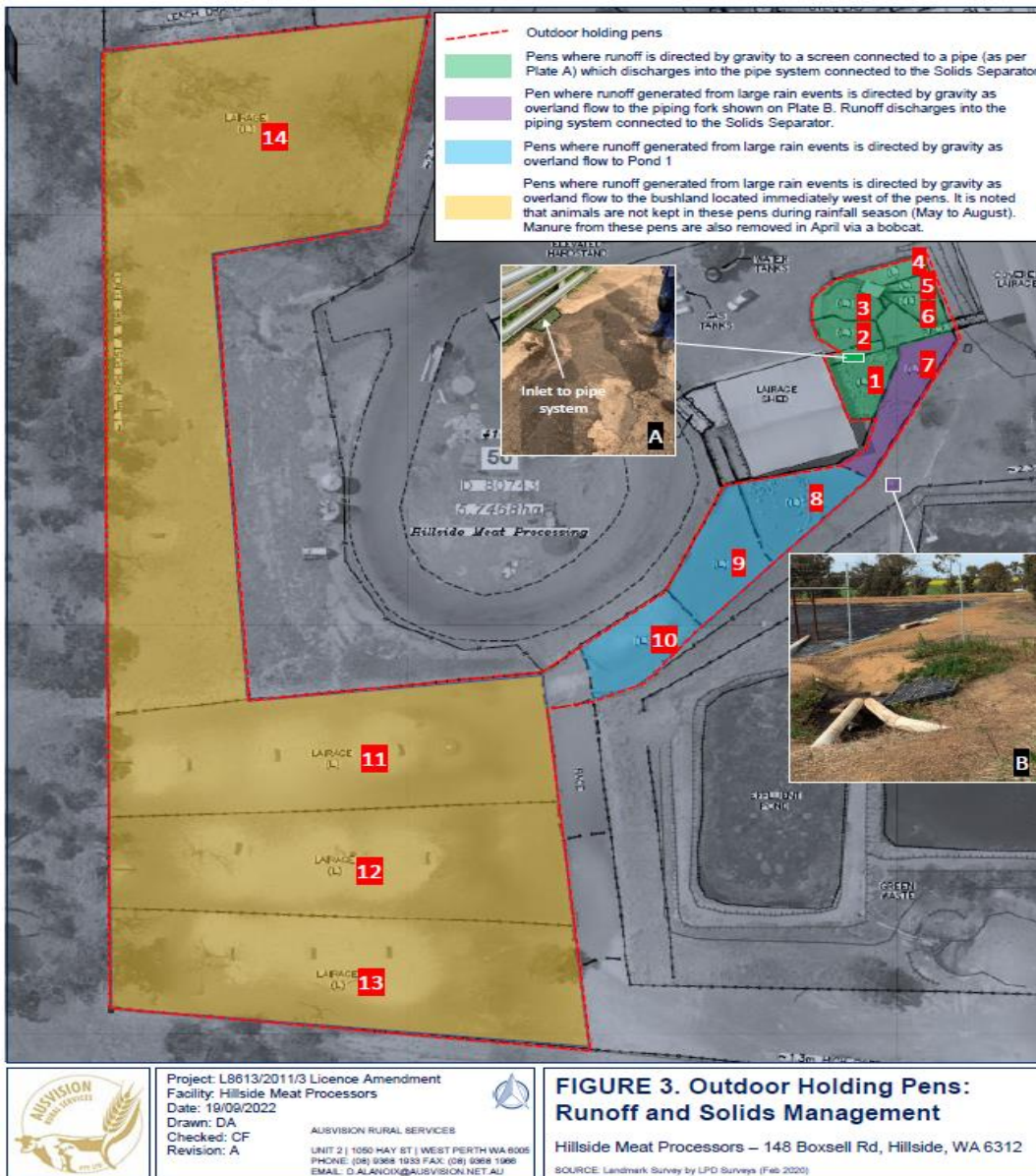


Figure 1: Outdoor holding pens: runoff and solids management

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 controls

The key emissions and associated actual or likely pathway during premises operation which have been considered in this amendment report are detailed in Table 1 below. Table 1 also details the proposed control measures the licence holder has proposed to assist in controlling

these emissions, where necessary.

Table 1: Licence holder controls (from application)

Fellmongering

Emission	Sources	Potential pathways	Proposed controls
Waste salt and salt laden wastewater (brine)	Fellmongering – processing and storage of sheepskins	Overland runoff potentially causing ecosystem disturbance or impacting surface water quality	Once deemed too dirty to use, waste salt is disposed into a skip bin and then disposed offsite. The liquid wastes from the discharge sump are pumped into impervious containment vessels which, when full, are disposed offsite to a licensed waste facility via controlled waste carrier.

Uncovered holding yards

Emission	Sources	Potential pathways	Proposed controls
Odour	Holding (and feeding) of sheep and goats in the external holding yards (yards 1-14)	Air/windborne pathway causing negative impacts to health and amenity	Nil
Dust			Nil
Solid waste (sheep manure and sediment) and nutrient laden stormwater		Overland runoff potentially causing ecosystem disturbance or impacting groundwater or surface water quality	<p>Outdoor holding pens are only used when the number of animals exceeds the capacity of the lairage shed.</p> <p>Not more than 1800 animals will be kept on the premises (lairage) at any one time.</p> <p>Individual animals are kept in the outdoor pens for a maximum of 72 hours should they arrive on a Friday. Manure is removed from pens in April each year.</p> <p>Mechanical removal of manure from outdoor holding pens and storage on MPSA prior to forecasted rain.</p> <p>Runoff from pens 8 to 10, <u>when generated by large rainfall events</u>, is directed by gravity as overland flow directly to pond 1.</p> <p>DWER note: there is no evidence as to how this occurs or what happens with ‘smaller’ rainfall events</p> <p>Runoff from pens 1 to 6 is directed by gravity to a solids screen connected to a pipe which discharges into the pipe system connected to the solids separator, then discharges to pond 1.</p> <p>In order to prevent clogging of the pipe, we will clean the screen weekly during dry months, and every wet day over wetter months and storm events.</p>

3.1.2 Receptors

In accordance with the *Guideline: Risk assessments* (DWER 2020), the delegated officer has excluded employees, visitors and contractors of the licence holder’s 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/ Homesteads	<ul style="list-style-type: none"> • Approximately 500 m from the southwest corner of the premises boundary. • Approximately 1.8 km from the northeast boundary of the premises. • Approximately 4.5 km from southeast corner of premises boundary.
Environmental receptors	Distance from prescribed activity
Groundwater (Karri-Unproclaimed)	No mapping available.
Surface water body: Murray River System	Within northern part of outdoor holding pen 14 and within 240 m north of outdoor holding pens 11 – 13.
Narrogin Brook (Blackwood Tributary)	On premises – 340 m south of outdoor holding pen 13 and 200 m south of southern most WWTP pond.
Threatened Ecological Communities (TECs)/ Priority Ecological Communities (PECs)	Mapped Eucalypt Woodlands on the premises and within 0 – 35 m of outdoor holding pens 11 – 14 (see Figure 2)

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for those emission sources which are proposed to change and takes into account potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages are incomplete they have not been considered further in the risk assessment.

Where the licence holder has proposed mitigation measures/controls (as detailed in Section 3.1), 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 Table 3.

The revised licence L8613/2011/1 that accompanies this amendment report authorises emissions associated with the operation of the premises i.e., abattoir and fellmongering activities.

The conditions in the revised licence have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

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

Risk Event					Risk rating ¹	Licence holder's controls sufficient?	Reasoning	Regulatory controls
Source/ Activities	Potential emission	Potential pathways and impact	Receptors	Licence holder's controls	C = consequence L = likelihood			
Operation								
Fellmongering – processing and storage of sheepskins	Waste salt and salt laden wastewater (brine)	<p>Failure of containment and/or spills leading to overland runoff can potentially cause ecosystem disturbance or impact surface water quality.</p> <p>Salts that penetrate past the root zone can cause degraded soil structure and soil and groundwater contamination. In addition, there is a risk of contaminant transport in groundwater or overland runoff leading to surface water and TEC vegetation degradation.</p>	<p>The Murray River surface water system</p> <p>Narrogin Brook: 450 m south</p> <p>In situ soils</p> <p>TEC - Eucalypt Woodlands on the premises</p> <p>Groundwater: about 4 m below ground level</p>	Refer to Section 3.1	<p>C = Minor</p> <p>L = Rare</p> <p>Low Risk</p>	Yes	<p>According to the licence holder, waste salt is disposed of in a skip bin before being removed offsite. Liquid wastes (brine) from the fellmongering discharge sump are pumped into impervious containment vessels which, when full, are disposed offsite to a licensed waste facility via controlled waste carrier. As such, under normal operating conditions, the delegated officer considers there is low risk of brine or waste salt impacting on the environment due to the licence holder's infrastructure controls.</p> <p>Given that uncontrolled loss of containment of salt laden wastewater can cause ecosystem disturbance and degradation, the delegated officer considers the above infrastructure and waste management controls necessary in maintaining a low environmental risk and has therefore included them as regulatory controls in the licence. A condition has also been included in the licence requiring monthly monitoring of number and tonnes of skins processed in order to ensure the infrastructure and waste management controls are sufficient for the fellmongering occurring onsite.</p>	<p>Condition 1: Infrastructure and equipment requirements</p> <p>Condition 2: Waste management</p> <p><u>Condition 9: Monitoring of inputs and outputs</u></p>
Holding of sheep and goats in the external holding yards (yards 1-14)	Dust	Air/windborne pathway causing impacts to health and amenity	Residential premises located within 5 km of the premises	Refer to Section 3.1	<p>C = Minor</p> <p>L = Rare</p> <p>Low Risk</p>	n/a	<p>The nearest residential dwelling is 500 m southwest of the premises. Given this distance and that winds are generally westerly around Narrogin, the delegated officer considers that the risk of dust and odour impacting on the health and amenity of the nearest residents is low. Therefore, under current premises operating conditions, regulatory controls on dust and odour are not warranted in the licence.</p>	<p>The delegated officer has determined that the use of outdoor holding pens 11 – 14 will not be authorised for use under this amendment.</p> <p>Condition 10: The licence holder will be required to submit a works approval to construct drainage infrastructure and solids separator</p>
	Odour				<p>C = Minor</p> <p>L = Rare</p> <p>Low Risk</p>	n/a		
	Solid waste (manure and urine) and nutrient laden stormwater	<p>Overland runoff causing ecosystem disturbance or impacting surface water quality.</p> <p>Seepage/infiltration causing soil and groundwater contamination. Eutrophication past the root zone can cause degraded soil structure and soil and groundwater contamination. In addition, there is a risk of contaminant transport in groundwater or overland runoff leading to surface water and TEC vegetation degradation.</p>	<p>The Murray River surface water system</p> <p>Narrogin Brook: 450 m south</p> <p>In situ soils</p> <p>TEC - Eucalypt Woodlands on the premises</p> <p>Groundwater: about 4 m below ground level</p>	Refer to Section 3.1	<p>C = Moderate</p> <p>L = Likely</p> <p>Medium Risk</p>	No	<p>According to the licence holder, up to 315,000 sheep and goats are held in the outdoor holding pens over an annual period, with manure being removed from the pens only once per year (in April), via bobcat. Sheep manure is high in nutrients such as nitrogen, potassium and phosphate, as well as salts. With such large numbers of animals being held in the outdoor holding pens, there is an inherent risk of nutrient levels increasing in the soil with potential for nutrient leaching and runoff (Dowling and Crossley, 2004).</p> <p>The large number of animals held in the pens over an annual period, which is significantly larger than what is currently authorised on the licence, suggests that the premises is operating as a livestock saleyard or holding pen (Category 55). The licence does not currently authorise this activity and the licence holder will need to submit an application to amend the licence in order for this to be assessed.</p> <p>Furthermore, the existing WWTS has not been demonstrated to be able to effectively treat the volumes of wastewater from the outdoor holding pens, and the contaminated stormwater runoff from pens 8-10 flows directly into the ponds without any treatment. <i>National procedures and guidelines for intensive sheep and lamb feeding systems</i> (MLA, 2020) states that outdoor holding pens should have a drainage system which includes, non-exclusively, solids separation. Contaminated stormwater runoff from pens 11-14 discharge directly to adjacent TEC bushland. This constitutes pollution and is therefore not acceptable.</p> <p>As per the review of information provided in the application (see section 3.4) and the summary here, the delegated officer considers the use of outdoor holding pens 8 -14 unacceptable, and has not granted their use in the licence amendment.</p>	

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

Note 2: Proposed licence holder's controls are depicted by standard text. **Bold and underline text** depicts additional regulatory controls imposed by department.

3.3 Department review on application for fellmongering

The licence holder has applied for a production capacity of 900,000 skins per annual period under Category 83: Fellmongering. The delegated officer notes that the approved capacity for abattoir operations on the licence is 16,200 liveweight tonnes per annual period (sheep and goats), which equates to approximately 345,800 sheep (at +/- 46.85 kg per sheep). Therefore, to align with the assessed and approved capacity of abattoir operations, the delegated officer has determined that the approved production capacity, or throughput of skins, shall not exceed the number of animals processed under category 15 of this licence, or 345,000 skins per annual period.

3.4 Department review on application for outdoor holding pens

The delegated officer has reviewed the application for the use of the outdoor holding pens and found the following:

According to the application, 'the outdoor pens alone hold about 315,000 animals per year'. Assuming an adult sheep weighs about 46.85 kg, this equates to about 14,750 tonnes (liveweight). This number does not include the approved lairage and may exceed the authorised throughput of 16,200 tonnes (liveweight) per annual period currently on the licence. This would appear that the licence holder may be operating or proposing to operate the outdoor lairage pens not as lairage but as a Category 55: holding pen or sheep feedlot.

The department would assess any sheep feedlot against the *National procedures and guidelines for intensive sheep and lamb feeding systems* (MLA, 2020) (Guideline) and would require an application to include Category 55. There is an expectation that operators of sheep holding yards adhere to the provisions of the applicable Guideline. Table 4 below demonstrates the recommendations specified in this Guideline against the current licence holder controls.

Table 4: *National procedures and guidelines for intensive sheep and lamb feeding systems* (Guideline) recommendations against the proposed licence holder controls

Guideline Requirement	Requirement Specifications	Proposed Licence Holder Controls
Environmental protection		
Nutrients, salt, organic matter and water components of effluent and manure are effectively contained and sustainably utilised.	Effluent and manure strategies should include sale or land application.	Manure is removed via bobcat every April.
Intensive feeding systems must be sited, constructed, and operated so underground and surface resources do not become contaminated.	Groundwater management strategies should include infiltration reduction around the intensive feeding area and manure stockpiles. Groundwater quality should be monitored on a regular basis. Surface water management strategies should include management of; feeding area and manure stockpile runoff, effluent, or contaminated stormwater.	None proposed
On site waste utilisation areas be of sufficient size and capacity to accommodate the wastes	Effluent and manure utilisation areas should ensure that land is not degraded. Land degradation issues	Manure is removed via bobcat every April and stored on the Manure and Paunch Storage Area (MPSA)

generated from the intensive feeding systems activities with no deleterious build up of waste constituents in the soil.	that should be considered include; <ul style="list-style-type: none"> • decline in soil structure • salinisation • acidification • waterlogging • chemical contamination • erosion 	unless the MSPA is at capacity (15 m ³), at which point manure is placed directly into a licenced contractor's truck for removal offsite
Community Amenity		
Offensive odours, noise and dust be minimised to ensure negative effects on neighbouring properties and/or sensitive areas are kept to a minimum. Pests be controlled within intensive feeding systems.	Dust should be controlled within intensive feeding systems.	None proposed
Daily operations		
Relevant information be recorded to satisfy the authorities in the event of an official inquiry. An environmental management plan should be implemented at all times. Contingency plans be in place in the event of: <ul style="list-style-type: none"> • water supply or quality failure • feed supply or quality failure • extreme weather conditions • fire or flood 	All equipment should be maintained through regular cleaning, checking, repair of damage and re-calibration. Dust generated from containment areas, feedlot pens and roads should be kept to a minimum. The presence of dust should be controlled or prevented by implementation of the following strategies. Dust should be minimised in areas such as handling yards through the use of water sprinklers. Dust should be minimised within feedlot pens and containment areas through correct selection of soil types or resurfacing with suitable materials. Water applied for dust control should be applied during the early evening hours to reduce the effect of humidity during hot weather.	None proposed
Pen and waste management	Pens should be cleaned regularly to reduce depth of manure build up and allow faster drying as odour generation is likely to be much higher from a deep moist manure pack than from a shallow drier pack.	Manure is removed via bobcat every April and stored on the Manure and Paunch Storage Area (MPSA) unless the MSPA is at capacity (15 m ³), at which point manure is placed directly into a licenced contractor's truck for removal offsite.

- The Guideline states that spillage and wastewater from holding pens should drain directly into a drainage system. A drainage system minimises the risk of groundwater and surface water contamination and promotes the rapid drying of the pens after a rainfall event. The drainage system should include where appropriate:
 - diversion banks/drains upslope of outdoor pens;
 - drains should convey runoff to the WWTS;
 - solids separation by gravity; and

- holding/storage ponds of sufficient size to contain major storm events and/or extended periods of storage.

Runoff from outdoor holding pens 1 – 7 discharges to pond 1 after going through the solids separator, which is deemed appropriate against the Guideline, **but this additional volume of water is likely to overload the abattoir WWTP resulting in inadequate retention time and reduced treatment quality outcomes.**

Runoff from outdoor holding pens 8 – 10 is discharged directly to pond 1 without undergoing any treatment or solids separation, which is not deemed appropriate against the Guideline and will result in an excess solids loading of the WWTP

Outdoor holding pens 11 – 14 have no drainage and manure, and sediment contaminated stormwater is directed to a Threatened Ecological Community (TEC) bushland (see Figure 3). The only means of waste management in these pens is the removal of manure via a bobcat once a year (in April). This is not deemed appropriate against the Guideline. Moreover, pursuant to section 50(2) of the EP Act, a person who causes or allows waste to be placed in any position from which the waste –

- (a) Could reasonably be expected to gain access to any portion of the environment; and
- (b) Would in so gaining access be likely to result in pollution,

commits an offence.

The existing WWTS, which has a primary purpose of servicing the abattoir operations and approved lairage areas, has not been demonstrated to be able to effectively treat the wastewater/runn off from the outdoor holding pens. There is uncertainty around whether the ponds have sufficient treatment and holding capacity for runoff from the fourteen outdoor holding pens without compromising retention time and treatment.

While it is noted that outdoor holding pens 11 – 14 are not occupied during peak rainfall months (May – August), the delegated officer notes that the mean monthly rainfall for Narrogin in the shoulder months, particularly September and October, is considerable (46.2mm and 31mm, respectively) (Figure 3; BoM, 2023). It is still unacceptable to discharge stormwater runoff from even unoccupied holding pens to the environment due to the potential of causing pollution or environmental harm. All runoff from a sheep feedlot should be directed to a dedicated containment system and not to the abattoir WWTS.

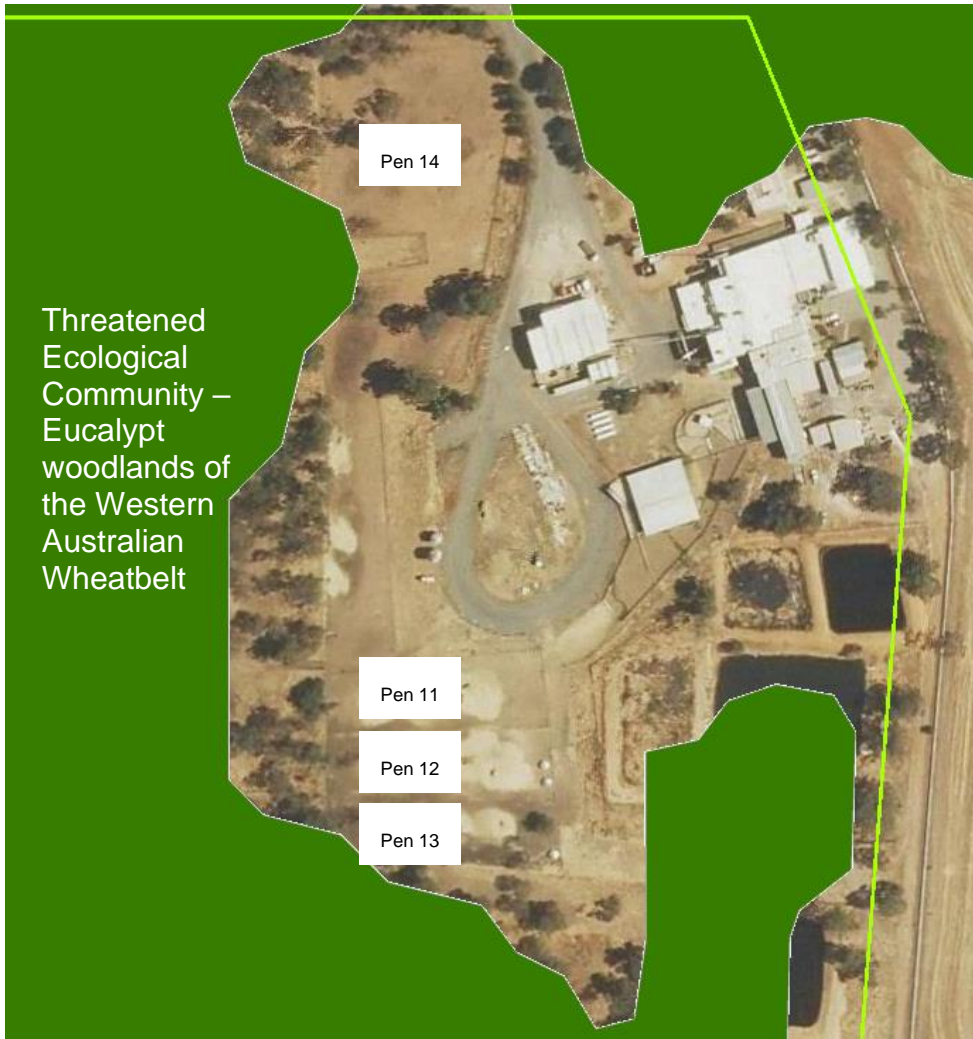


Figure 2: Outdoor holding pens (11-14) that discharge contaminated wastewater directly to adjacent bushland in close proximity to a TEC

Location: 810614 NARROGIN

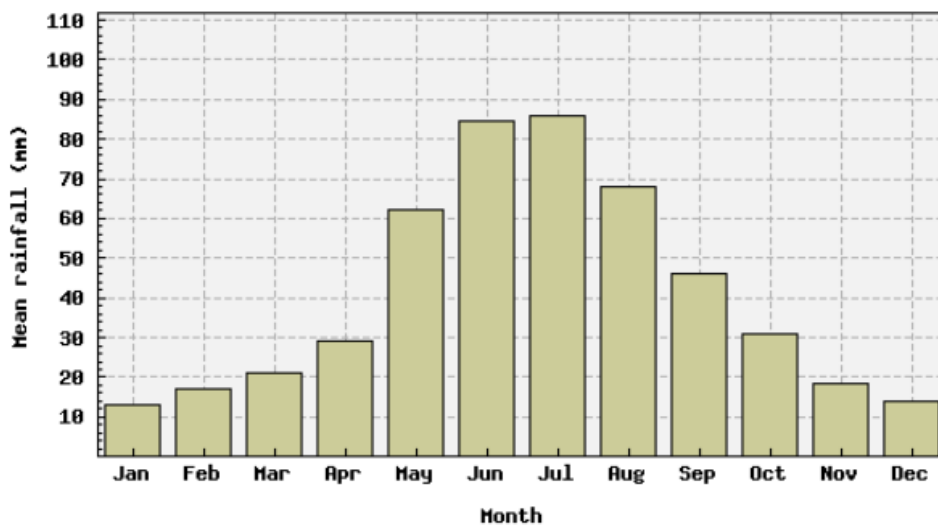


Figure 3: Mean monthly rainfall (mm) for Narrogin (BoM, 2023).

4. Consultation

Table 5 provides a summary of the consultation undertaken by the department.

Table 5: Consultation

Consultation method	Comments received
Local Government Authority advised of proposal (8/12/2022)	<p>The Shire of Narrogin(the Shire) replied on 03/01/2023. It considers that the treatment of skins (fellmongering) and the use of the holding pens as lairage is consistent with the land use definition for Abattoir under the former Shire of Narrogin Town Planning Scheme No 2. Therefore, a development approval is not required at this point in time, unless there is an increase to the activity onsite or additional development to be constructed onsite.</p> <p>The Shire also advised that, due to the activities onsite and the types of waste generated from these activities, that a management plan be developed to address these issues.</p> <p>The Shire also noted that an existing building to the east of the property is built over the property boundary, which is designated as a Road Reserve. The licence holder will need to address and formalise the building encroachment.</p>
Licence holder was provided with draft amendment on 31 January 2023 and again on 3 March 2023	See Appendix 1 for licence holder's comments on the draft that were received on 17 February 2023, 27 February 2023 and 13 April 2023

5. Decision

5.1 Category 83: Fellmongering

The delegated officer has determined that the salting of skins (fellmongering) does not pose an unacceptable risk of impacts to public health or the environment. This determination is based on the following:

- Solid wastes (salt) are contained in a skip bin before being removed offsite;
- liquid wastes (brine) are pumped into impervious containment vessels which, when full, are disposed offsite to a licensed waste facility via controlled waste carrier; and
- the delegated officer has approved a production capacity of not more than 345,800 skins per annual period.

5.2 Outdoor holding pens

The delegated officer has made the following determinations relating to the 14 existing outdoor holding pens:

5.2.1 Outdoor holding pens 1 - 7

The licence holder must ensure that wastewater, stormwater or contaminated stormwater generated within outdoor holding pens 1 – 7 is directed through the solids separator before discharge into pond 6 of the wastewater treatment system.

The licence holder will be required to submit a works approval to construct appropriate drainage infrastructure to ensure that all waste, stormwater and contaminated stormwater that is generated within outdoor holding pens 8 – 14 is directed through a solids screen to a dedicated containment system or pond.

The amended licence only allows licence holder to use outdoor holding pens 1- 7, pending a

further application to install drainage and containment systems for the remaining lairage or holding pens.

5.2.2 Outdoor holding pens 8 - 14

The delegated officer has determined that the use of outdoor holding pens 8 to 14 pose an unacceptable risk of impacts to the environment and has therefore not authorised their use until the necessary wastewater drainage and dedicated containment systems are installed (and approved through a works approval)

This determination is based on the following:

- The sheep holding yards/sheep feedlot do not meet the requirements of the *National procedures and guidelines for intensive sheep and lamb feeding systems* (MLA, 2020) (Guideline) due to the lack of controlled drainage to contain and control manure and nutrient runoff from the outdoor holding pens, leading to increased risk of impacts to soil, groundwater and surface waters and potential damage to native vegetation and a TEC (see section 3.4).
- The proposed use of the outdoor holding pens suggests the premises is to be used as a Category 55: Livestock saleyard or holding pen and not as a lairage for the short-term holding of stock prior to slaughter. This is also based on information contained in the application that suggests that far more sheep are proposed to be held in the outdoor holding yards (900,000 sheep per year) than is authorised to be slaughtered at the abattoir (16,200 liveweight tonnes, or approximately 270,000 sheep per year).

5.3 Administrative amendments

The delegated officer has made some administrative changes to the licence to amend typographical errors. These include:

- Condition 5, Table 4: Emissions to land – Biochemical Oxygen Demand limit amended from 30 kg/ha/annual period to 30 kg/ha/day;
- Condition 11 – submission date of Annual Audit Compliance Report amended from 1 March to 28 January in each year; and
- Condition 14 – submission date of an environmental report amended from 1 March to 28 January in each year.

References

1. Ausvision Rural Services, *Application form and supporting documents*, submitted to DWER on 4 October 2022.
2. BoM 2023, *Climate statistics for Australian locations, Narrogin*, Bureau of Meteorology. http://www.bom.gov.au/climate/averages/tables/cw_010614.shtml Accessed 9 January 2023.
3. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
4. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
5. Dowling, E.A. and Crossley, E.K. (2004) The environmental impact of sheep confinement feeding systems, *Animal Production in Australia* **25**, 41-44.
6. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.
7. MLA 2020, *National procedures and guidelines for intensive sheep and lamb feeding systems*, Meat & Livestock Australia Limited.

Appendix 1: Summary of licence holder's comments on draft licence and decision report

Summary of Licence Holder's comments (received 17/02/2023)	Department's response
Licence holder proposed an increase in the approved production capacity for category 83: fellmongering from 270,000 skins to no more than the assessed production capacity of category 15 (345,800).	The department accepts this change and has incorporated it into the amended licence.
Licence holder provided a map of all outdoor holding pens (figure 1).	The department utilised this map within this report and the amended licence.
Licence holder proposed a dedicated drainage and treatment system to be constructed for outdoor holding pens 11 – 14.	The department has determined that outdoor holding pens 11 – 14 will not be authorised under the licence, given the risk to the environment.
Licence holder provided an updated figure of the wastewater treatment system (figure 2)	The department utilised this figure in this report and the amended licence.
Summary of Licence Holder's comments (received 27/03/2023 and 13/04/2023)	Department's response
The plant will not keep more than 1800 animals on site at any one time. When the plant is occupied by small livestock of a same line (i.e. a flock from a particular farmer) the covered lairage can accommodate all animals. However, there are situations (we consider emergencies) when the outdoor yards (1-10) are necessary.	The department has determined that uncovered holding yards 8 – 14 will not be authorised under this licence amendment given the absence of drainage and risk to the environment.
Assuming a fully occupied facility by larger animals, 700 animals will be kept in the outdoor yards, as inferred in Table 1 . In this scenario, 425 heads will be placed in Yards 1-6 while 275 will be placed in Yards 7-9. Please note that, as killing progresses throughout the day, animals from Yards 7-9 will be gradually rotated into Yards 1-6 to limit the time spent in yards lacking adequate drainage. Alternatively, animals in Yards 7-9 will be processed first. This will similarly result in a reduction of the time spent in yards lacking adequate drainage. Regardless of the scenario, animals which are received on a late Friday and which are placed in the outdoor yards, will remain there up until the following Monday.	The proposed solids cleaning of Pens 1 – 7 has been accepted and added as regulatory controls to the licence.
I confirm, a works application for the drainage works will be provided by 30 June 2023.	Noted