



Application for Licence Amendment

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

Licence Number	L8812/2014/2
Licence Holder	Hillcroft Farms Pty Ltd
ACN	158 889 699
File Number	DER2014/000620-2
Premises	Hillcroft Farms 1395 Yornaning Road LOL GRAY WA 6311 Legal description – Lots 13054 and 4301 on Deposited Plan 146817 as depicted in Schedule 1 of the licence.
Date of Report	09/02/2023
Proposed Decision	Intent to grant revised licence

1. Purpose and scope of assessment

Hillcroft Farms Pty Ltd (licence holder) operate an existing intensive piggery, Hillcroft Farms (premises), under licence L8812/2014/2, located approximately 24 km NW of Narrogin. The existing piggery has an approved design capacity of up to 16,710 animals with an animal feed manufacturing facility producing up to 10,000 tonnes of animal feed per annum.

On 27 November 2022 the licence holder applied to amend licence L8812/2014/2 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act) to construct an additional three, and decommission two, piggery sheds.

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 construction and operation, and decommissioning, of the piggery sheds.

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. Amendment description (from application)

The licence holder is proposing to decommission two finisher sheds and replace them with three new bacon sheds.

Existing finisher sheds numbers 4 and 5 (see map in Schedule 1 of licence) were built in the 1980's and are no longer fit for purpose. The concrete flooring in these sheds is deteriorating causing regular blockages in the drains; penning inside the sheds are rusted and broken; and the pitch of the roof does not allow for optimum airflow. The effluent system is also outdated in these sheds, which currently uses tipping buckets to flush large volumes of water down the pits to remove the effluent.

The licence holder is proposing to replace these two sheds with three new sheds, similar in design to the other sheds on the premises. The new sheds will be 74 m long by 12 m wide and 2.8 m high with a 15-degree roof pitch.

The sheds will have 600 mm high concrete walls poured on top of a 100 mm concrete pad. Concrete slats will then sit on these walls across the entire shed, allowing up to a 600 mm deep under floor storage of the effluent.

Plugs in the concrete pad will be pulled periodically to direct effluent from the underfloor storage area to the existing separator sheds via 300 mm polyvinyl chloride (PVC) piping located under the concrete pad.

The internal layout will include 40 pens within each shed. PVC curtains on side walls will be able to be open or closed to regulate temperature. The roof and end walls will be made from fire resistant insulation panel and a vent ridge will be located on the roof pitch to draw out hot air. There will be 8 fans in each shed for circulating air and cooling the sheds.

It is noted that there is no proposed increase in the design capacity of the piggery associated with the construction and decommissioning of this infrastructure. The additional sheds will allow the pigs more space and the improved wastewater system (pull plugs rather than tipping buckets) is expected to decrease wastewater flow to the existing ponds.

3. Risk assessment

The amendment is limited to the assessment of the construction and operation of three additional piggery sheds and the decommissioning of two existing piggery sheds. The assessment is based on the following:

- The closest rural residence is 1.5 km WNW of the existing piggery, where the proposed sheds will be constructed, and is owned by the licence holder. The closest rural residence on land not owned by the licence holder is 2.3 km SE of the existing piggery. This separation distance is in accordance with the relevant industry standard, *National Environmental Guidelines for Indoor Piggeries (NEGIP), Australian Pork Limited, May 2018*, which recommends a fixed separation distance of at least 250 m to rural dwellings. Additionally, no complaints have been received by the department in the past 5 years.
- The construction and decommissioning of the sheds will be of short duration, approximately 6 months.
- Proposed sheds will be oriented with their long axis east-west to minimise heat load, which is in accordance with the NEGIP.
- Proposed sheds will be constructed with a concrete base and walls with an impervious PVC underfloor effluent collection system, fully slatted flooring, and will be roofed, which is consistent with the NEGIP.
- The proposed pull plug effluent system, replacing the existing tipping flush bucket system, is expected to reduce the volume of water required to flush the sheds; therefore, decreasing the wastewater load to the ponds.
- Sheds will be adequately ventilated, including a vent ridge on the roof pitch to draw out hot air, PVC wall curtains that can be lowered or raised to regulate temperature, and fans in each shed to circulate air, all which is in accordance with the NEGIP.

The delegated officer notes that there is no proposed increase to stock numbers, rather the additional sheds will allow the pigs more room, reducing stocking densities, allowing them to grow faster and be turned out quicker at a lower cost.

The delegated officer has determined that with the construction and operation of the proposed sheds and decommissioning of the two sheds, there is no increase to existing emissions and discharges from the premises. Providing the proposed infrastructure is maintained to design standard, once constructed, the risk of soil and groundwater contamination, or impacts of dust and noise to the closest rural receptors, from operation of the proposed sheds appears to be acceptable.

4. Consultation

Table 1 provides a summary of the consultation undertaken by the department.

Table 1: Consultation

Consultation method	Comments received	Department response
Local Government Authority advised of proposal (8 December 2022)	<p>The Shire of Cuballing responded on 12 December 2022 with the following comments:</p> <ul style="list-style-type: none"> - no additional planning or development approval is required to the proposed changes; - building approvals for the new sheds are currently being assessed by the Shire; and 	The department notes the Shire's response.

Consultation method	Comments received	Department response
	- the replacement of the old sheds will have a positive aesthetic effect and improve animal welfare.	
Licence holder was provided with draft amendment on 19 January 2023	The licence holder provided comments on the 19 th and 31 st January 2023. The licence holder confirmed number, sizing, type and location of existing infrastructure on the premises. Additionally, the licence holder confirmed how often the conventional sheds and deep litter shelters are cleaned out.	The licence conditions and amendment report have been updated with information provided by the licence holder.

5. Decision

Based on the assessment in this amendment report, the delegated officer has determined that an amended licence will be granted. Licence holder commitments have been conditioned along with necessary administration and reporting requirements for the construction and decommissioning of the infrastructure.

In addition to the amendment relevant to this application, the licence has been updated to the most recent format with existing conditions being transferred, but not reassessed, to the new format. Therefore, numbering, wording and format of existing conditions may have changed, but the intent remains the same.

6. Summary of amendments

Table 2 provides a summary of the proposed amendments and will act as record of implemented changes. All proposed changes have been incorporated into the revised licence as part of the amendment process.

Table 2: Summary of licence amendments

Condition no.	Proposed amendments
1	Works – construction of proposed sheds 1, 2 and 3 – conditions based on licence holder’s application.
2 and 3	Reporting conditions for the construction of the proposed sheds.
4	Works – decommissioning of sheds 4 and 5.
5 and 6	Reporting conditions for the decommissioning of sheds 4 and 5.
10 (b)	Addition of section relating to works conducted for construction of proposed sheds and decommissioning of sheds.

Table 3 shows additional changes that were made to the licence with the update to the new format.

Table 3: Conditions map

Existing condition	Revised licence condition	Conversion notes
1, Table 1, Item 1	7, Table 2, Item 2	Gilt developer shed. Addition of “approximate” wording to allow for minor sizing differences in infrastructure.

Existing condition	Revised licence condition	Conversion notes
1, Table 1, Item 2	7, Table 2, Items 4, 5 and 6	Screw press solids separator. Split this condition into separate items as the existing condition referred to several pieces of infrastructure: the screw press solids separator, collection tank and clear water tank.
2	8, Table 3, Item 1	Wastewaters from the piggery to be directed to the wastewater treatment system.
-	7, Table 2, Item 1 and 3	Addition of conventional piggery sheds and deep litter shelters to infrastructure table.
-	7, Table 2, Item 11	Addition of existing animal feed manufacturing facility to infrastructure table. The licence holder has previously submitted information to the department stating that dust extractors are used within the feed mill.
3, Table 3	7, Table 2	Information in existing table 3 has been incorporated into the revised licence infrastructure table 2. Addition of "approximate" wording to allow for minor sizing differences in infrastructure. Some wording has been added, i.e. collection tank, to ensure the infrastructure the condition is referring to is specified.
4	7, Table 2	Management of wastewater treatment ponds information has been incorporated into the revised licence infrastructure table.
5, Table 3	8, Table 3	Management of wastes. The wording "the licence holder must ensure that" has been removed from items 3, 4 and 5 within Table 3, as it is already stated in the wording of condition 8. "Composting area" has been amended to "stockpile area" to ensure consistency with infrastructure labels in Table 2.
6	9	Limit of number of animals on the premises.
7 and 8	10 and 11	Maintaining accurate and auditable books.
9	12	Complaints
10	13	Compliance – AACR
11	14	Annual Environmental Report. Removal of format for reporting total number of animals.
Definitions	Definitions	Addition of definition for PVC
Schedule 1: Maps	Schedule 1: Maps	Additional map to show location of proposed infrastructure and infrastructure to be decommissioned.