



Licence number L8344/2009/2

Licence holder Primary Partners Pty Ltd

ACN 108 266 548

Registered business address 70 Franklin St
ADELAIDE SA 5000

Duration 07/05/2012 to 06/05/2034

Date of amendment 20/10/2025

Premises details Roebuck Export Depot
Lot 382 Broome Rd
ROEBUCK WA 6725

Legal description –
Lot 382 on Plan 193561
As shown in the premises map in Schedule 1

Prescribed premises category description (Schedule 1, Environmental Protection Regulations 1987)	Assessed design capacity
Category 55: Livestock saleyard or holding pen: premises on which live animals are held, pending their sale, shipment or slaughter	Not more than 80,000 cattle per year

This amendment is granted to the licence holder, subject to the attached conditions, on 20 October 2025, by:

MANAGER, PROCESS INDUSTRIES

STATE-WIDE DELIVERY (ENVIRONMENTAL REGULATION)

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

Licence history

Date	Ref number	Summary of changes
07/05/2009	L8344/2009/1	Licence granted
07/05/2012	L8344/2009/2	Replacement licence issued for 5 years
18/12/2014	L8344/2009/2	Licence amended
18/02/2016	L8344/2009/2	Licence amended to change occupier details, increase throughput and incorporate improvements to stormwater infrastructure
31/03/2016	L8344/2009/2	Licence amended to extend duration of compliance with improvement conditions
09/06/2016	L8344/2009/2	Amendment Notice 1 – extend duration for completion of stormwater pond upgrades
06/11/2017	L8344/2009/2	Amendment Notice 2 – update to occupier details, authorisation to allow chemical to remain in cattle dip over the wet season
22/02/2024	L8344/2009/2	Licence amended to add stormwater retention ponds constructed in 2016 as authorised infrastructure, require all manure to be composted on-site, including construction of hardstand pad, update to licence format and conditions set, including addition of infrastructure table and inclusion of operational controls relating to manure and stormwater management
05/08/2024	L8344/2009/2	Licence amended to extend timeframe for construction of manure storage and composting pad
30/01/2025	L8344/2009/2	Licence amended to further extend timeframe for construction of manure storage and composting pad
20/10/2025	L8344/2009/2	Licence amended to further extend timeframe for construction of manure storage and composting pad, inclusion of works for flood and drainage mitigation

Interpretation

In this licence:

- (a) the words ‘including’, ‘includes’ and ‘include’ in conditions mean ‘including but not limited to’, and similar, as appropriate;
- (b) where any word or phrase is given a defined meaning, any other part of speech or other grammatical form of that word or phrase has a corresponding meaning;
- (c) where tables are used in a condition, each row in a table constitutes a separate condition;
- (d) any reference to an Australian or other standard, guideline or code of practice in this licence:
 - (i) if dated, refers to that particular version; and
 - (ii) if not dated, refers to the latest version and therefore may be subject to change over time;
- (e) unless specified otherwise, any reference to a section of an Act refers to that section of the EP Act; and
- (f) unless specified otherwise, all definitions are in accordance with the EP Act.

NOTE: This licence requires specific conditions to be met but does not provide any implied authorisation for other emissions, discharges, or activities not specified in this licence.

Licence conditions

The licence holder must ensure the following conditions are complied with:

Premises operation

Infrastructure and equipment

1. The licence holder must ensure the site infrastructure and equipment listed in Table 1 is maintained in accordance with the corresponding design requirements in that table.

Table 1: Infrastructure and equipment requirements

	Infrastructure and equipment	Description and design requirements	Infrastructure location
1	Cattle pens	(a) Cattle pens, including: (i) 46 individual pens ("IP"); (ii) 7 drafting pens for handling animals at arrival/dispatch, including dipping ("DP"); (iii) 11 individual hospital pens ("W"); (iv) 7 outer holding paddocks ("HP"); (b) All pens must be located within the controlled drainage area (CDA); (c) Floor area of all pens must: (i) be sloped to facilitate drainage to the runoff drains to the sedimentation pond; (ii) comprise compacted in-situ Pindan soil with sufficient bunding that prevents runoff of effluent to the environment and overland water running into the pens;	"Pens", as shown in Schedule 1: Premises map
2	Controlled Drainage Area (CDA)	(a) Must comprise all operational areas relating to the holding complex, including pens, hard catchment (laneways, drafts, drains, sedimentation pond, stormwater retention and evaporation pond) and other work areas; (b) Area must be sloped to facilitate drainage of surface water runoff to the runoff drains and sedimentation pond; (c) Must be designed to direct uncontaminated surface runoff away from the pens, paddocks and ponds;	As per design requirements
3	Sedimentation pond	Pond must be maintained: (a) immediately downgradient of the CDA, with minimum holding capacity of 720 m³ and maximum operating depth of 1.0 m; (b) with a concrete spillway on the discharge point to the stormwater retention and evaporation pond; (c) with an in-situ liner comprising compacted Pindan soils;	"Sedimentation pond", as shown in Schedule 1: Premises map
4	Stormwater retention and evaporation pond	Pond must be maintained: (a) at the lowest point of the CDA; (b) with sufficient capacity to contain the volume of runoff from the CDA, allowing for: (i) a minimum freeboard of 500 mm; and (ii) overtopping does not occur on average more than once every 10 years; (c) with an in-situ liner comprising compacted Pindan	"Stormwater retention and evaporation pond", as shown in Schedule 1: Premises map

	Infrastructure and equipment	Description and design requirements	Infrastructure location
		soil;	
5	Cattle dip	Dip must be maintained: (a) with a roof that covers the entire length and width of the channel; (b) with maximum capacity of 17,000 litres of chemical; (c) with splash barriers on either side of the dip to prevent splashing of chemical outside of the dip or rainwater entering from the sides; (d) both the entry and exit of the drip and the cattle draining areas comprise impervious concrete and are sloped such that they drain back into the dip.	"Cattle dip", as shown in Schedule 1: Premises map

Improvement works

2. The licence holder must construct the infrastructure listed in Table 2 in accordance with the requirements set out in that table.

Table 2: Improvement works

	Infrastructure	Design and construction requirement	Completion date
1	Manure storage and composting pad	(a) Must construct a storage pad of sufficient size for stockpiling the amount of manure and managing mortalities between off-site removal events; (b) Pad must be underlain by at least 300 mm of clay or other suitable compactable soil or a synthetic liner; (c) For clay or other compactable soil, permeability and compaction must be demonstrated by geotechnical testing conducted by a qualified professional engineer and in accordance with AS 1289; (d) Area must be bunded to ensure manure leachates and contaminated surface runoff is contained within the pad area; (e) Pad must be sloped to facilitate drainage of leachates and surface runoff to the stormwater retention and evaporation pond; (f) Must construct a concrete (or similar) spillway at the lowest point of the pad, to convey runoff into the runoff pond and minimise the overflow of sediment into the pond.	1 February 2026
2	Flood and drainage mitigation	(a) Must complete works that achieve the following outcomes: (i) external catchment runoff from north of the cattle yards is diverted to the east; (ii) stormwater from the north-west is prevented from flowing into the cattle yards; (iii) runoff from the controlled drainage areas (cattle yards and compost pad) is separated from other stormwater and is diverted to the stormwater retention pond; and (iv) external catchment runoff south of the cattle yards is diverted away from the stormwater retention pond.	1 February 2026

Improvement works – compliance reporting

3. The licence holder must, within 30 days of the infrastructure specified in condition 2 being constructed:
 - (a) undertake an audit of their compliance with the requirements of condition 2; and
 - (b) prepare and submit to the CEO a report on that compliance.
4. The report required by condition 3, must include as a minimum:
 - (a) certification whether the items of infrastructure or components thereof, as specified in condition 2, have been constructed in accordance with the relevant requirements specified in that condition;
 - (b) as constructed plans and a detailed site plan for each item of infrastructure or component of infrastructure specified in condition 2;
 - (c) details that demonstrate how the pad and containment pond are designed and constructed to be fit-for-purpose, including how the pad and pond are sufficiently sized;
 - (d) details of the works completed for flood and drainage mitigation and how the outcomes specified in condition 2 have been achieved;
 - (e) results of clay materials testing and geotechnical testing (if required); and
 - (f) be signed by a person authorised to represent the licence holder and contains the printed name and position of that person.
5. Subject to condition 4(a), where an item of infrastructure or component of infrastructure has been certified as not being constructed, or does not comply with the corresponding requirements, or contains material defects, the licence holder must:
 - (a) correct the non-compliant or defective works, prior to re-certifying in accordance with condition 4(a); or
 - (b) provide to the CEO a description of, and explanation for, any departures from the requirements specified in Table 2 that do not require rectification and do not constitute a material defect along with the report required by condition 3.

Operational requirements

6. The licence holder must ensure the premises infrastructure listed in Table 3 is operated in accordance with the requirements set out in that table.

Table 3: Infrastructure operational requirements

	Site infrastructure	Operational requirement
1	Cattle pens	<u>Cattle handling</u> (a) The total number of cattle to be held on the premises at any one time must not exceed 17,416 at 300 kg for more than 30 consecutive days; (b) Cattle must not be held within the domestic holding paddocks, unless for: (i) quarantine purposes; and/or (ii) emergency or short-term overflow, where: - the number of animals must not exceed 300 per paddock; and - holding must not exceed 4 consecutive days; <u>Pen cleaning and manure management</u> (c) Pens must be cleaned to ensure the depth of dry manure on the pen surface and under pen fence lines does not exceed 50 mm; (d) Manure removed from pen surfaces must be directly transferred to the designated manure storage and composting pad (once constructed);

	Site infrastructure	Operational requirement
		(e) Pens must be maintained to ensure there are no depressions, potholes and wet spots in the pen surface; <u>Mortalities management</u> (f) All mortalities must be removed from the pens within 24 hours of death; (g) Following post mortem at the cattle handling yards (if required), deceased animals removed from pens must be taken directly to the designated manure storage and composting pad and be managed in accordance with condition 9;
2	Controlled Drainage Area	Must be maintained to ensure all surface runoff is able to flow freely to the sedimentation pond;
3	Sedimentation pond	Must be maintained such that surface runoff flows freely after rainfall events; (a) Must be cleaned of sludge at least once every 12 months; (b) Removed sludge must be directly transferred to the designated manure storage and composting pad (once constructed);
4	Stormwater retention and evaporation pond	An operational freeboard of 500 mm must be maintained at all times;
5	Cattle dip	Must be operated to prevent the loss or overflow of chemicals.

Inspection of infrastructure

7. The licence holder must undertake inspections of the scope and type and at the corresponding frequency specified in Table 4.
8. Where any inspection required by condition 7 identifies an appropriate level of environmental protection is not being maintained or there is a foreseeable risk of an environmental incident, the works approval holder must:
 - (a) take corrective action to mitigate adverse environmental consequences as soon as practicable; and
 - (b) maintain a written log of all inspections undertaken, with each inspection signed off by the person who conducted the inspection.

Table 4: Inspection of infrastructure requirements

Scope of inspection	Type of inspection	Frequency of inspection
Sedimentation basin, evaporation pond	Visual integrity (including signs of leakage and deterioration), freeboard capacity	Weekly during March to December (when operating)

Emissions

Manure and mortalities management

9. The licence holder must ensure manure and mortalities are:
 - (a) managed as unprocessed materials, by taking off-site to a premises that is lawfully able to accept that kind of waste, such as a licensed composting or organics recycling facility or licensed solid waste facility; and/or
 - (b) composted (once the manure storage and composting pad has been constructed), to produce a composted product, using a forced aeration composting system.
10. For manure and mortalities to be considered a composted product, the licence holder must:
 - (a) conduct quality sampling and testing in accordance with Table 5, and keep accurate

records, to demonstrate the finished product meets the following requirements for indicator pathogens and plant propagules:

- (i) *Salmonella* spp.: absent in 50 g (dry weight equivalent);
 - (ii) faecal coliforms: <1,000 MPN or CFU/g (dry weight equivalent); and
 - (iii) nil germination of viable plant propagules after 21 days;
- and
- (b) conduct testing and keep accurate records to demonstrate the finished product passes the threshold level specified in Table N3.2 of AS 4454 for at least two tests from Group A;
- otherwise, it must be considered to be an unprocessed material and be managed in accordance with condition 9(a).

Table 5: Composted product monitoring requirements

Parameter	Sampling method	Analytical method	Testing frequency
Faecal coliforms, <i>Salmonella</i> spp.	AS 4454 – Appendix A	AS 4454 – Appendix D	At least one sample per 500 tonnes of both composted product from manure feedstocks, and from manure feedstock and mortalities
Viable plant propagules		AS 4454 – Appendix M	

Off-site removal of composted products

11. The licence holder must keep accurate records of the volumes of all composted products from manure feedstocks, and all composted products from manure feedstocks and mortalities removed from the premises and/or sold off-site.

Monitoring

Monitoring of inputs and outputs

12. The licence holder must monitor and record inputs and outputs in accordance with Table 6.

Table 6: Monitoring and recording of inputs and outputs

Input / Output	Parameter	Units	Frequency
Animals received and dispatched at the premises	Cattle	Number	Aggregated total monthly summary
Mortalities			

Complaints management

13. The licence holder must investigate any complaints received by the licence holder (whether received directly from a complainant or forwarded to them by the department or another party) about any alleged emissions from the premises.
14. Following receipt of a complaint directly from a complainant about any alleged emissions from the premises, the licence holder must:
 - (a) respond to the complainant within 72 hours of receipt of the complaint; and
 - (b) within 10 calendar days of receipt of the complaint, provide a summary of the outcomes of any investigation(s) conducted in response to the complaint, including any corrective and preventative action(s) taken in response to the complaint, unless such communication is not requested by the complainant.

Records and reporting

Record-keeping

15. The licence holder must record the following information in relation to complaints received by the licence holder (whether directly from a complainant or forwarded to them by the department or another party) about any alleged emissions from the premises:
 - (a) the name and contact details of the complainant (if provided);
 - (b) the time and date of the complaint;
 - (c) the complete details of the complaint and any other concerns or other issues raised;
 - (d) the complete details of any activities being undertaken, where, and the weather and wind conditions at the time of the complaint;
 - (e) the complete details and dates of any investigation(s) conducted in response to the complaint;
 - (f) a summary of the findings of any investigation(s) conducted in response to the complaint, including details of the person(s) responsible for the investigation(s);
 - (g) a summary of any corrective and preventative action(s) taken in response to the complaint;
 - (h) a summary of the time taken to respond to the complaint; and
 - (i) a summary of all communications with the complainant.
16. The licence holder must maintain accurate and auditable books including the following records, information, reports, and data required by this licence:
 - (a) the calculation of fees payable in respect of this licence;
 - (b) any maintenance of infrastructure that is performed in the course of complying with condition 1;
 - (c) records of manure and mortalities removed from the premises in accordance with condition 11;
 - (d) records of inputs and outputs in accordance with condition 12; and
 - (e) complaints received under condition 15.
17. The books specified under condition 16 must:
 - (a) be legible;
 - (b) if amended, be amended in such a way that the original version(s) and any subsequent amendments remain legible and are capable of retrieval;
 - (c) be retained by the licence holder for the duration of the licence; and
 - (d) be available to be produced to an inspector or the CEO as required.

Notification requirements

18. The licence holder must notify the CEO, within 24 hours of a mass mortalities event and/or an emergency animal disease (EAD) incident, including:
 - (a) the number of cattle that have died;
 - (b) the proposed plan for on-site handling and management of all carcasses; and
 - (c) the proposed disposal method and site.

Annual reporting requirements

19. The licence holder must:
 - (a) undertake an audit of their compliance with the conditions of this licence during the preceding annual period; and
 - (b) prepare and submit to the CEO, by no later than 28 January in each year, an Annual Audit Compliance Report in the approved form.
20. The licence holder must submit to the CEO, by no later than 28 January in each year, an environmental report containing the information listed in Table 7 for the preceding

annual period.

Table 7: Annual environmental report

Condition or table	Parameter
-	Summary of any environmental incidents that have occurred during the annual period and any action taken
Condition 8	Records of inspections of infrastructure
Condition 10	Process monitoring and testing and biological stability testing records for composted manure and mortalities compost
Condition 11	Records of composted manure and mortalities compost removed from the premises
Condition 12	Records of inputs and outputs
Condition 15	Complaints summary
Condition 18	Summary of any notifications
Condition 19	Compliance

Definitions

In this licence, the terms in Table 8 have the meanings defined.

Table 8: Definitions

Term	Definition
Annual Audit Compliance Report (AACR)	means a report submitted in a format approved by the CEO (relevant guidelines and templates may be available on the Department's website)
annual period	means a 12-month period commencing from 1 January until 31 December in that same year
AS 1289	means the most recent version and relevant parts of the Australian Standard AS 1289 <i>Methods of testing soils for engineering purposes</i>
AS 4454	means the most recent version and relevant parts of the Australian Standard AS 4454 <i>Composts, soil conditioners and mulches</i>
CEO	means Chief Executive Officer. CEO for the purposes of notification means: Director General Department administering the <i>Environmental Protection Act 1986</i> Locked Bag 10 Joondalup DC WA 6919 info@dwer.wa.gov.au
composted manure	means organic material that has been aerobically composted where the temperature is shown to decline and stabilise to the extent the product can be safely used on land and can come into direct contact with plants without negative effects. For the purpose of this licence, composted manure means manure that has been composted using a forced aeration composting system and meets the testing requirements and maturation levels specified in condition 10
CFU	colony forming units – a measure of viable colonogenic cell numbers in CFU/mL
condition	means a condition to which this licence is subject under s.62 of the EP Act
Department	means the department established under section 35 of the <i>Public Sector Management Act 1994</i> and designated as responsible for the administration of Part V, Division 3 of the EP Act
dip	means a trench-like structure for containing one or more chemicals where cattle are to be immersed within that chemical
dipping area	means the area consisting of the dip, including associated walls, roof and drainage pipes and the post-dip cattle holding area where dip chemicals drain off the cattle
EAD	Emergency Animal Disease; means a disease that is: (a) exotic to Australia; (b) a variant of an endemic disease; (c) a serious infectious disease of unknown or uncertain cause; or (d) a severe outbreak of a known endemic disease; and that is considered to be of national significance with serious social or trade implications
EP Act	means the <i>Environmental Protection Act 1986</i> (WA)
freeboard	means the distance between the maximum water surface elevations and the top of retaining banks or structures at their lowest point

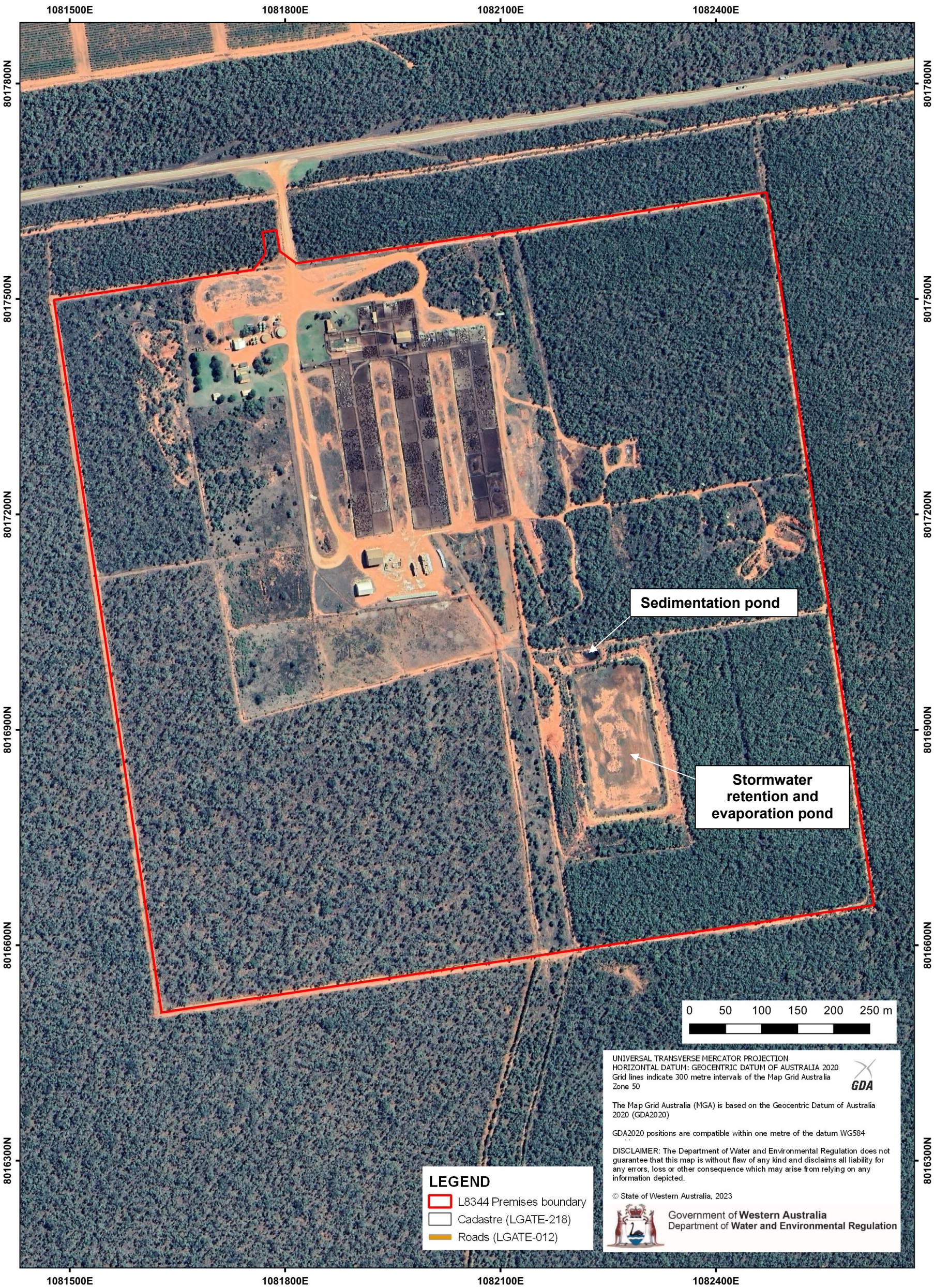
Term	Definition
licence	means this document, which evidences the grant of a licence by the CEO under section 57 of the EP Act, subject to the specified conditions contained within
licence holder	refers to the occupier of the premises being the person to whom this licence has been granted, as specified at the front of this licence
licensed composting facility	means a premises that holds a current and valid licence granted by the CEO under section 57 of the EP Act for a compost manufacturing and soil blending facility (category 67A)
licensed solid waste facility	means a premises that holds a current and valid licence granted by the CEO under section 57 of the EP Act for a solid waste facility (category 61A)
manure	means faeces and urine. For the purpose of this licence, manure also means pond solids/sediment/sludge
mass mortalities event	means a noteworthy occurrence of one or more sick or dead animals clustered in space and time, especially where the cause of death is unknown or where the mortality rate exceeds baseline mortality expectations
mortalities compost	means the product of the partial decomposition of carcasses, which have been managed within bays or windrows. For the purpose of this licence, mortalities compost means mortalities that have been composted using a forced aeration composting system and meets the testing requirements and maturation levels specified in condition 10
MPN	most probable number – a statistical method used to estimate the viable numbers of bacteria in a sample
pasteurisation	means a process whereby organic materials are treated to significantly reduce the numbers of plant and animal pathogens, and plant propagules
premises	refers to the premises to which this licence applies, as specified at the front of this licence and as shown on the map in Schedule 1 to this licence
qualified professional engineer	means a person who: (a) holds a tertiary academic qualification specialising in geotechnical or civil engineering; and (b) has a minimum of 3 years of experience working in the area of geotechnical or civil engineering; or is otherwise approved by the CEO to act in this capacity

END OF CONDITIONS

Schedule 1: Maps

Premises map

The boundary of the prescribed premises and the location of key stormwater infrastructure is shown in the map below (red line).



Site layout and infrastructure map

