



Government of Western Australia
Department of Environment Regulation

Your ref L8656/2012/1
Our ref 2012/3612
Enquiries Richard Wilson
Phone 9333 7545
Fax 9333 7550
Email richard.wilson@der.wa.gov.au

Mr Stephen Atwell
Welldon Beef
PO Box 521
WILLIAMS WA 6391

Dear Mr Atwell

ENVIRONMENTAL PROTECTION ACT 1986: LICENCE GRANTED
Premises: Welldon Beef – Glenfield Road, WILLIAMS
Licence Number: L8656/2012/1

Further to my letter dated 13 November 2014, please find enclosed your amended *Environmental Protection Act 1986* licence.

If you have any questions or objections relating to the licence, please do not hesitate to contact the enquiries officer above on 9333 7545 for clarification or discussion of any grievances you have.

If you are concerned about, or object to any aspect of the amendment, you may lodge an appeal with the Minister for Environment within 21 days from the date on which this licence is received. The Office of the Appeals Convenor can be contacted on 6467 5190 to find out the procedure and fee.

Members of the public may also appeal the amendments. The Appeals Registrar at the Office of the Appeals Convenor can be contacted after the closing date of appeals to check whether any appeals were received.

Yours sincerely

Ed Schuller
Officer delegated under section 20
of the *Environmental Protection Act 1986*

20 November 2014



Licence

Environmental Protection Act 1986, Part V

Licensee: GR Atwell Pty Ltd

Licence: L8656/2012/1

Registered office: 155 Spencer Street
BUNBURY WA 6230

ACN: 009 386 592

Premises address: Welldon Beef
531 Glenfield Road
WILLIAMS WA 6391
Being Part of Lot 13987 on Plan 205768 and Part of Lot 5371 on Plan 117798

Issue date: Thursday, 4 October 2012

Commencement date: Thursday, 4 October 2012

Expiry date: Tuesday, 3 October 2017


Prescribed premises category

Schedule 1 of the *Environmental Protection Regulations 1987*

Category number	Category description	Category production or design capacity	Approved Premises production or design capacity
1	Cattle feedlot: premises on which the watering and feeding of cattle occurs, being premises- (a) situated less than 100 metres from a watercourse; and (b) on which the number of cattle per hectare exceeds 50.	500 animals or more	2,500 animals

Conditions

This Licence is subject to the conditions set out in the attached pages.


.....
Officer delegated under section 20
of the *Environmental Protection Act 1986*



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Introduction

This Introduction is not part of the Licence conditions.

DER's industry licensing role

The Department of Environment Regulation (DER) is a government department for the state of Western Australia in the portfolio of the Minister for Environment. DER's purpose is to advise on and implement strategies for a healthy environment for the benefit of all current and future Western Australians.

DER has responsibilities under Part V of the *Environmental Protection Act 1986* (the Act) for the licensing of prescribed premises. Through this process DER works with the business owners, community, consultants, industry and other representatives to prevent, control and abate pollution and environmental harm to conserve and protect the environment. DER also monitors and audits compliance with works approvals and licence conditions, takes enforcement action as appropriate and develops and implements licensing and industry regulation policy.

Licence requirements

This Licence is issued under Part V of the Act. Conditions contained within the Licence relate to the prevention, reduction or control of emissions and discharges to the environment and to the monitoring and reporting of them.

Where other statutory instruments impose obligations on the Premises/Licensee the intention is not to replicate them in the licence conditions. You should therefore ensure that you are aware of all your statutory obligations under the Act and any other statutory instrument. Legislation can be accessed through the State Law Publisher website using the following link:
<http://www.slp.wa.gov.au/legislation/statutes.nsf/default.html>

For your Premises relevant statutory instruments include but are not limited to obligations under the:

- *Environmental Protection (Unauthorised Discharges) Regulations 2004* – these Regulations make it an offence to discharge certain materials such as contaminated stormwater into the environment other than in the circumstances set out in the Regulations.
- *Environmental Protection (Controlled Waste) Regulations 2004* - these Regulations place obligations on you if you produce, accept, transport or dispose of controlled waste.
- *Environmental Protection (Noise) Regulations 1997* – these Regulations require noise emissions from the Premises to comply with the assigned noise levels set out in the Regulations.

You must comply with your licence. Non-compliance with your licence is an offence and strict penalties exist for those who do not comply.



Licence holders are also reminded of the requirements of section 53 of the Act which places restrictions on making certain changes to prescribed premises unless the changes are in accordance with a works approval, licence, closure notice or environmental protection notice.

Licence fees

If you have a licence that is issued for more than one year, you are required to pay an annual licence fee prior to the anniversary date of issue of your licence. Non payment of annual licence fees will result in your licence ceasing to have effect meaning that it will no longer be valid and you will need to apply for a new licence for your Premises.

Ministerial conditions

If your Premises has been assessed under Part IV of the Act you may have had conditions imposed by the Minister for Environment. You are required to comply with any conditions imposed by the Minister.

Premises description and Licence summary

The Welldon beef feedlot has been operating at a small scale for 30 years. In 2006, the owners constructed a new feedlot that has a capacity of 1936 head (17.6 m² per animal stocking density); it was not constructed under a works approval. The stocking density is within the National Feedlot Accreditation Scheme accepted range of 9-25 m²/head. The Premises is located in the Shire of Williams, approximately 4.5 km east-southeast from the edge of the Williams town site. The closest sensitive receptor is a farmhouse, located approximately 1470 m west of the premises boundary.

The feedlot is located on the northern aspect in a landscape of long, gentle and undulating hill slopes and divides. Typical soil types in the area are clayey sands overlying granite rock. The feedlot is situated on shallow soils on a granitic ridge, with at least 20 m of solid granite present beneath the site. Average annual rainfall is 493 mm with the peak period between May and September. A number of watercourses intersect the premises, the closest being a minor non-perennial watercourse, located approximately 100 m to the south-west of the holding pens. The next closest watercourse is Fitts Creek, located approximately 1 km from the holding pens. Fitts Creek is a tributary of the Williams River which eventually flows into the Murray and the Peel Inlet.

The feedlot consists of 16 pens split between two rows. A 3 m concrete apron has been constructed in front of each of the feed bunks and around water troughs. A controlled drainage area has been established with catch drains present below each row of pens to capture and direct wastewater to the sedimentation and evaporation pond. The catch drains are lined with on-site clays with low permeability. The licensee currently has an active works approval (W5635/2014/1) improve the capacity to manage wastewater, including the construction of a sedimentation basin and increasing the size of the evaporation pond to 3 ML. This is in preparation for the eventually increasing the controlled drainage area and construction of additional feedlot pens.

An existing freshwater diversion bank directs all fresh water from upslope of the feedlot into a fresh water dam.

Following pen cleaning the manure is stockpiled on the Premises within the controlled drainage area. This solid waste may be removed from the Premises or applied onto paddock within the Premises for the production of crops, and accordingly the Licence includes a condition pertaining to the application of manure to land.

Dead animals are transported to a gravel pit approximately 3 km from the feedlot on Lot 5371 on Plan 117798. They are buried, covered with at least 500 mm of gravel and left to decompose. The gravel pit is assumed to have a very low permeability.

The main emissions and discharges that are likely to arise from the operation of the Welldon Beef Feedlot are odour, dust and the application of solid waste to land. Given the distance to the nearest sensitive receptors, any odour and dust that is produced through the operation of the feedlot are not expected to cause any nuisance. The application of solid waste to land is addressed through the Improvement Section of this licence.



This Licence is the result of an amendment sought by the Licensee to increase the approved throughput of the premises and remove restrictions relating to the application of solid waste to land. DER has converted the existing licence to a new format REFIRE licence as part of this amendment, and updated licence conditions accordingly.

The licences and works approvals issued for the Premises since 04/10/2012 are:

Instrument log		
Instrument	Issued	Description
L8656/2012/1	04/10/2012	Licence issued – for 2,000 animals
W5635/2014/1	13/06/2014	Works approval to increase the capacity of the evaporation pond and construction of sedimentation pond
L8656/2012/1	20/11/14	Licence amended to REFIRE format (this Licence) and increase the Premises throughput.

Severance

It is the intent of these Licence conditions that they shall operate so that, if a condition or a part of a condition is beyond the power of this Licence to impose, or is otherwise *ultra vires* or invalid, that condition or part of a condition shall be severed and the remainder of these conditions shall nevertheless be valid to the extent that they are within the power of this Licence to impose and are not otherwise *ultra vires* or invalid.

END OF INTRODUCTION



Licence conditions

1 General

1.1 Interpretation

1.1.1 In the Licence, definitions from the *Environmental Protection Act 1986* apply unless the contrary intention appears.

1.1.2 For the purposes of this Licence, unless the contrary intention appears:

'Act' means the *Environmental Protection Act 1986*;

'annual period' means the inclusive period from 1 July until 30 June in the following year;

'carcass' means the dead body of animal (cattle);

'CEO' means Chief Executive Officer of the Department of Environment Regulation;

'code of practice for the storage and handling of dangerous goods' means the document titled 'Storage and handling of dangerous goods: Code of Practice' published by the Department of Mines and Petroleum, as amended from time to time;

'dangerous goods' has the meaning defined in the *Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007*;

'CEO' for the purpose of correspondence means;

Manager Licensing (Greater Swan)
Department of Environment Regulation
Locked Bag 33
CLOISTERS SQUARE WA 6850
Telephone: (08) 9333 7510
Facsimile: (08) 9333 7550
Email: grswanbooragoon@der.wa.gov.au

'environmentally hazardous material' means material (either solid or liquid raw materials, materials in the process of manufacture, manufactured products, products used in the manufacturing process, by-products and waste) which if discharged into the environment from or within the premises may cause pollution or environmental harm. Note: Environmentally hazardous materials include dangerous goods where they are stored in quantities below placard quantities. The storage of dangerous goods above placard quantities is regulated by the Department of Mines and Petroleum;

'evaporative pond' means a type of holding pond where the primary disposal mechanism of the effluent is by evaporation;

'feedlot' means all areas of the premises used for feed-lotting activities, including but not limited to laneways and pens;

'freeboard' means the distance between the maximum water surface elevations and the top of retaining banks or structures at their lowest point;

'fugitive emissions' means all emissions not arising from point sources identified in Sections 2.2, 2.3, 2.4 and 2.5;



'holding pond' means a pond designed to capture and store the normal runoff before the captured runoff is either applied to cropland or evaporated;

'in-situ soils' means soils that are in place and have not been moved from their original place of deposition;

'leachate' means liquid released by or water that has percolated through waste and which contains some of its constituents;

'Licence' means this Licence numbered L8656/2012/1 and issued under the Act;

'Licensee' means the person or organisation named as Licensee on page 1 of the Licence;

'National Guidelines' means the current version of *National Guidelines for Beef Cattle Feedlots in Australia*, as amended from time to time;

'NLAR' means Nutrient Limited Application Rate to be calculated based on the guidance provided in the National Guidelines for Beef Cattle Feedlots in Australia (as amended) ;

'Premises' means the area defined in the Premises Map in Schedule 1 and listed as the Premises address on page 1 of the Licence;

'Schedule 1' means Schedule 1 of this Licence unless otherwise stated;

'Schedule 2' means Schedule 2 of this Licence unless otherwise stated;

'sedimentation system' means systems to remove the readily-settleable fraction of the solids entrained in effluent. This may include a pond, basin or terrace that discharges effluent to a holding pond;

'sludge' means any mud-like deposit or mixtures of faecal matter and spilt feed derived from the pens;

'solids' means any solid or spadeable faecal matter and spilt feed derived from the pens; and

'wastewater treatment system' means a wastewater and effluent management system consisting of catch drain and evaporative pond;

1.1.3 Any reference to an Australian or other standard in the Licence means the relevant parts of the standard in force from time to time during the term of this Licence.

1.1.4 Any reference to a guideline or code of practice in the Licence means the version of that guideline or code of practice in force from time to time, and shall include any amendments or replacements to that guideline or code of practice made during the term of this Licence.

1.2 General conditions

1.2.1 Nothing in the Licence shall be taken to authorise any emission that is not mentioned in the Licence, where the emission amounts to:

- (a) pollution;
- (b) unreasonable emission;
- (c) discharge of waste in circumstances likely to cause pollution; or
- (d) being contrary to any written law.

1.2.2 The Licensee shall operate and maintain all pollution control and monitoring equipment to the manufacturer's specification or any relevant and effective internal management system.



1.2.3 The Licensee, except where storage is prescribed in section 1.3, shall ensure that environmentally hazardous materials are stored in accordance with the code of practice for the storage and handling of dangerous goods.

1.2.4 The Licensee shall immediately recover, or remove and dispose of spills of environmentally hazardous materials outside an engineered containment system.

1.2.5 The Licensee shall implement all practical measures to prevent stormwater run-off becoming contaminated by the feedlot activities on the Premises.

1.3 Premises operation

1.3.1 The licensee shall ensure that all wastewaters from feedlot operations including wash down water, by-products wastewater and contaminated run-off are directed to a wastewater treatment system.

1.3.2 The Licensee shall ensure that waste material is only stored and/ or treated within vessels or compounds provided with the infrastructure detailed in Table 1.3.1.

Table 1.3.1: Containment infrastructure

Structure	Material	Infrastructure requirements
Catch drains	Contaminated stormwater; Wastewater	Lined with insitu soils
Evaporative pond	Wastewater	Lined with in-situ soils and designed to capture a 1 in 20 ARI rainfall event.
Feedlot pens	Cattle	Lined with in-situ soils and located within the controlled drainage area.
Burial pits	Carcasses	Lined with in-situ soils.
Solids stockpile storage area	Manure	Lined with in-situ soils and located within the controlled drainage area

1.3.3 The Licensee shall manage the evaporation pond such that:

- (a) overtopping of the ponds does not occur;
- (b) a minimum top of embankment freeboard of at least 900 mm is maintained;
- (c) the integrity of the containment infrastructure is maintained;
- (d) trapped overflows are maintained on the outlet of ponds to prevent carry-over of surface floating matter; and
- (e) vegetation and floating debris (emergent or otherwise) is prevented from encroaching onto pond surfaces or inner pond embankments.

1.3.4 The Licensee shall ensure that waste types specified in Table 1.3.2 are managed in accordance with the requirements in Table 1.3.2 unless they are taken off-site for lawful use or disposal.



Table 1.3.2: Management of Waste

Waste type	Disposal strategy	Operational requirements
Treated wastewater	Evaporation	None specified
Carcass	On-site burial	(i) Burial pits shall be located at least 100 m from any watercourse, wetland or external property boundary; (ii) Bottom of the burial pit shall be at least 2 metres above seasonal high water table; and (iii) Carcasses shall be covered with at least 500 mm of soil immediately upon deposit.
Feedlot solids	On-site application to land	(i) Solids and sludge derived from the feedlot shall be disposed of evenly by means of a mechanical spreader; (ii) Feedlot solids shall only be applied to land that is a minimum of 1 metre above the winter groundwater table; (iii) Application of feedlot solids shall not occur within 100 metres of a watercourse or wetland; and (iv) Quantity of feedlot solids applied directly to land per hectare does not exceed the NLAR for a particular soil type, crop type, crop use and feedlot solids composition.
Feedlot solids, pond sludge (as relevant)	Stockpiling	(i) Leachate from stockpile area shall not enter the environment; and (ii) Stockpiles shall be managed so as to avoid offensive odour generation.

2 Emissions

2.1 General

- 2.1.1 The Licensee shall record and investigate the exceedance of any descriptive or numerical limit or target specified in any part of section 2 of this Licence.

2.2-2.4 Point source emissions to air, surface water and groundwater

There are no specified conditions relating to point source emissions to air, surface water and groundwater in this section.

2.5 Emissions to land

There are no specified conditions relating to emissions to land in this section.

2.6 Fugitive emissions

- 2.6.1 The Licensee shall use all reasonable and practical measures to prevent and where that is not practicable to minimise dust emissions from the Premises.

2.7 Odour

- 2.7.1 The Licensee shall ensure that odour emitted from the Premises does not unreasonably interfere with the health, welfare, convenience, comfort or amenity of any person who is not on the Premises.



2.8 Noise

There are no specified conditions relating to noise in this section.

3 Monitoring

There are no specified conditions relating to monitoring in this section.

4 Improvements

4.1 Improvement program

- 4.1.1 The Licensee shall complete the improvements in Table 4.1.1 by the date of completion in Table 4.1.1.
- 4.1.2 The Licensee, for improvements not specifically requiring a written submission, shall write to the CEO stating whether and how the Licensee is compliant with the improvement within one week of the completion date specified in Table 4.1.1.



Table 4.1.1 Improvement program

IR Reference Number	Improvement requirement	Timeframe
IR1	<p>The Licensee shall submit to the CEO a Solids Application to Land Assessment Report. The Report shall include but not be limited to:</p> <ul style="list-style-type: none">(i) A preliminary assessment which clearly identifies maximum rate at which the feedlot solids can be applied to land based on the soil vulnerability category as per Table 5 of the Guidelines for the Environmental Management of Beef Cattle Feedlots in Western Australia, July 2002, Published by the Department of Agriculture;(ii) A map identifying location and dimensions of existing solids application area, in hectares; and(iii) Details of management actions which will be taken to ensure that the feedlot solids application rate at the premises does not exceed the maximum allowable rate calculated in (i).	12 months
IR 2	<p>The Licensee shall submit to the CEO an Irrigation Assessment Report. The Report shall include but not be limited to:</p> <ul style="list-style-type: none">(i) A preliminary assessment to determine the minimum area required for irrigation, based on the soil-limiting hydraulic loading and nutrient loading;(ii) A map detailing location and dimensions of existing area under irrigation, in hectares; and(iii) Details of proposed actions to be taken in the event that existing irrigation area is lesser than the minimum required area calculated based on (i).	60 days prior to irrigation
IR3	<p>In the event that the Licensee intends to undertake application of feedlot solids and wastewater to the same area, the Licensee shall submit to the CEO a Nutrient Management Report which accounts for cumulative nutrient loading from all sources including application of manure, wastewater and chemical fertilisers, which may be applied to the approved solid/ liquid land application area on the Premises. The Report shall include but not be limited to:</p> <ul style="list-style-type: none">(i) Nutrient balance which clearly identifies availability of nutrients from each source, crop uptake rates, soil storage capacity and environmental loss during the assessment year and accounts for any nutrient credits for following years;(ii) Detailed assessment of total nutrient application rate to the existing land application area on the premises (t/ha/year) based on (i);(iii) Qualitative and quantitative risk assessment to determine acceptable nutrient application rate to minimise potential of soil, surface water and groundwater contamination; and(iv) Details of proposed management measures (if applicable) including timelines, to be implemented to reduce the risk of potential environmental impacts that may occur as a result of exceeding the recommended nutrient loading rates specified in part (iii).	60 days prior to irrigation



5 Information

5.1 Records

- 5.1.1 All information and records required by the Licence shall:
- (a) be legible;
 - (b) if amended, be amended in such a way that the original and subsequent amendments remain legible or are capable of retrieval;
 - (c) except for records listed in 5.1.1(d) be retained for at least 6 years from the date the records were made or until the expiry of the Licence or any subsequent licence; and
 - (d) for those following records, be retained until the expiry of the Licence and any subsequent licence:
 - (i) off-site environmental effects; or
 - (ii) matters which affect the condition of the land or waters.
- 5.1.2 The Licensee shall ensure that:
- (a) any person left in charge of the Premises is aware of the conditions of the Licence and has access at all times to the Licence or copies thereof; and
 - (b) any person who performs tasks on the Premises is informed of all of the conditions of the Licence that relate to the tasks which that person is performing.
- 5.1.3 The Licensee shall complete an Annual Audit Compliance Report indicating the extent to which the Licensee has complied with the conditions of the Licence, and any previous licence issued under Part V of the Act for the Premises for the previous annual period.
- 5.1.4 The Licensee shall implement a complaints management system that as a minimum records the number and details of complaints received concerning the environmental impact of the activities undertaken at the Premises and any action taken in response to the complaint.

5.2 Reporting

- 5.2.1 The Licensee shall submit to the CEO an Annual Environmental Report within 60 calendar days after the end of the annual period. The report shall contain the information listed in Table 5.2.1 in the format or form specified in that table.



Table 5.2.1: Annual Environmental Report

Condition or table (if relevant)	Parameter	Format or form ¹
-	Summary of any failure or malfunction of any pollution control equipment and any environmental incidents that have occurred during the annual period and any action taken	None specified
-	Total number of animals held on the feedlot in a tabular format for each month and including annual total.	None specified
-	Total number of carcasses buried each month and including annual total.	None specified
-	Quantity of manure applied to land: (i) total tonnes applied; and (ii) average tonnes/ha for each application throughout the year.	None specified
-	Verification details on the applied feedlot solids NLAR	None specified
5.1.3	Compliance	Annual Audit Compliance Report (AACR)
5.1.4	Complaints summary	None specified

Note 1: Forms are in Schedule 2

5.3 Notification

5.3.1 The Licensee shall ensure that the parameters listed in Table 5.3.1 are notified to the CEO in accordance with the notification requirements of the table.

Table 5.3.1: Notification requirements

Condition or table (if relevant)	Parameter	Notification requirement ¹	Format or form ²
2.1.1	Breach of any limit specified in the Licence	Part A: As soon as practicable but no later than 5pm of the next usual working day.	N1
-	Any failure or malfunction of any pollution control equipment or any incident, which has caused, is causing or may cause pollution	Part B: As soon as practicable	

Note 1: Notification requirements in the Licence shall not negate the requirement to comply with s72 of the Act

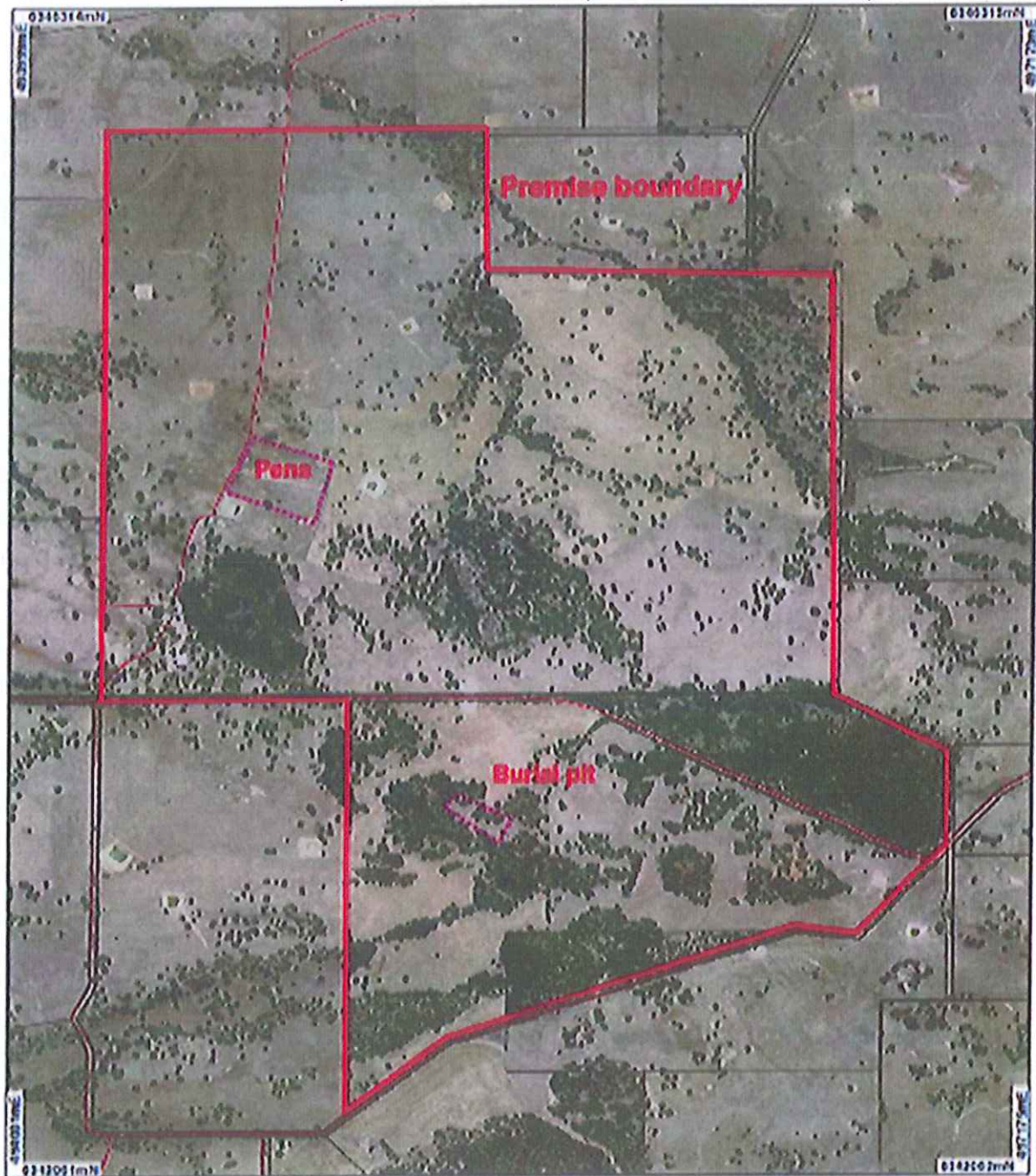
Note 2: Forms are in Schedule 2



Schedule 1: Maps

Premises map

The Premises is shown in the map below. The red line depicts the Premises boundary.





Schedule 2: Reporting & notification forms

These forms are provided for the proponent to report monitoring and other data required by the Licence. They can be requested in an electronic format.

ANNUAL AUDIT COMPLIANCE REPORT PROFORMA

SECTION A

LICENCE DETAILS

Licence Number:	Licence File Number:
Company Name:	ABN:
Trading as:	
Reporting period: _____ to _____	

STATEMENT OF COMPLIANCE WITH LICENCE CONDITIONS

1. Were all conditions of the Licence complied with within the reporting period? (please tick the appropriate box)

Yes ☐ Please proceed to Section C

No ☐ Please proceed to Section B

Each page must be initialled by the person(s) who signs Section C of this Annual Audit Compliance Report (AACR).

Initial:



SECTION B

DETAILS OF NON-COMPLIANCE WITH LICENCE CONDITION.

Please use a separate page for each Licence condition that was not complied with.

a) Licence condition not complied with:	
b) Date(s) when the non compliance occurred, if applicable:	
c) Was this non compliance reported to DER?:	
<input type="checkbox"/> Yes <input type="checkbox"/> Reported to DER verbally Date _____ <input type="checkbox"/> Reported to DER in writing Date _____	<input type="checkbox"/> No
d) Has DER taken, or finalised any action in relation to the non compliance?:	
e) Summary of particulars of the non compliance, and what was the environmental impact:	
f) If relevant, the precise location where the non compliance occurred (attach map or diagram):	
g) Cause of non compliance:	
h) Action taken, or that will be taken to mitigate any adverse effects of the non compliance:	
i) Action taken or that will be taken to prevent recurrence of the non compliance:	

Each page must be initialled by the person(s) who signs Section C of this AACR

Initial:



SECTION C

SIGNATURE AND CERTIFICATION

This Annual Audit Compliance Report (AACR) may only be signed by a person(s) with legal authority to sign it. The ways in which the AACR must be signed and certified, and the people who may sign the statement, are set out below.

Please tick the box next to the category that describes how this AACR is being signed. If you are uncertain about who is entitled to sign or which category to tick, please contact the licensing officer for your premises.

If the licence holder is		The Annual Audit Compliance Report must be signed and certified:
An individual	<input type="checkbox"/> <input type="checkbox"/>	by the individual licence holder, or by a person approved in writing by the Chief Executive Officer of the Department of Environment Regulation to sign on the licensee's behalf.
A firm or other unincorporated company	<input type="checkbox"/> <input type="checkbox"/>	by the principal executive officer of the licensee; or by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation.
A corporation	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	by affixing the common seal of the licensee in accordance with the <i>Corporations Act 2001</i> ; or by two directors of the licensee; or by a director and a company secretary of the licensee, or if the licensee is a proprietary company that has a sole director who is also the sole company secretary – by that director, or by the principal executive officer of the licensee; or by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation.
A public authority (other than a local government)	<input type="checkbox"/> <input type="checkbox"/>	by the principal executive officer of the licensee; or by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation.
a local government	<input type="checkbox"/> <input type="checkbox"/>	by the chief executive officer of the licensee; or by affixing the seal of the local government.

It is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give information on this form that to their knowledge is false or misleading in a material particular. There is a maximum penalty of \$50,000 for an individual or body corporate.

I/We declare that the information in this annual audit compliance report is correct and not false or misleading in a material particular.

SIGNATURE: _____

SIGNATURE: _____

NAME:
(printed) _____

NAME:
(printed) _____

POSITION: _____

POSITION: _____

DATE: ____/____/____

DATE: ____/____/____

SEAL (if signing under seal)



Licence: L8656/2012/1
Form: N1

Licensee: GR Atwell Pty Ltd
Date of breach:

Notification of detection of the breach of a limit or any failure or malfunction of any pollution control equipment or any incident which has caused, is causing or may cause pollution.

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

Part A

Licence Number	
Name of operator	
Location of Premises	
Time and date of the detection	

Notification requirements for the breach of a limit	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value	
Date and time of monitoring	
Measures taken, or intended to be taken, to stop the emission	

Notification requirements for any failure or malfunction of any pollution control equipment or any incident which has caused, is causing or may cause pollution	
Date and time of event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken , or intended to be taken, to stop any emission	
Description of the failure or accident	



Part B

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident.	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission.	
The dates of any previous N1 notifications for the Premises in the preceding 24 months.	

Name	
Post	
Signature on behalf of GR Atwell Pty Ltd	
Date	



Decision Document

Environmental Protection Act 1986, Part V

Proponent: GR Atwell Pty Ltd

Licence: L8656/2012/1

Registered office: 155 Spencer Street
BUNBURY WA 6230

ACN: 009 386 592

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531 Glenfield Road
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Being Part of Lot 13987 on Plan 205768 and Part of Lot 5371 on Plan 117798

Issue date: Thursday, 4 October 2012

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Expiry date: Tuesday, 3 October 2017

Decision

Based on the assessment detailed in this document the Department of Environment Regulation (DER), has decided to issue an amended licence. DER considers that in reaching this decision, it has taken into account all relevant considerations and legal requirements and that the Licence and its conditions will ensure that an appropriate level of environmental protection is provided.

Decision Document prepared by:

Richard Wilson
Licensing Officer

Decision Document authorised by:

Alan Kietzmann
A/Manager Licensing



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1 Purpose of this Document

This decision document explains how DER has assessed and determined the application and provides a record of DER's decision-making process and how relevant factors have been taken into account. Stakeholders should note that this document is limited to DER's assessment and decision making under Part V of the *Environmental Protection Act 1986*. Other approvals may be required for the proposal, and it is the proponent's responsibility to ensure they have all relevant approvals for their Premises.

Works approval and licence conditions

DER has three types of conditions that may be imposed on works approvals and licences. They are as follows;

Standard conditions (SC)

DER has standard conditions that are imposed on all works approvals and licences regardless of the activities undertaken on the Premises and the information provided in the application. These are included as the following conditions on works approvals and licences:

Works approval conditions: 1.1.1-1.1.4, 1.2.1, 1.2.2, 5.1.1 and 5.1.2.

Licence conditions: 1.1.1-1.1.4, 1.2.1-1.2.4, 5.1.1-5.1.4 and 5.2.1.

For such conditions, justification within the Decision Document is not provided.

Optional standard conditions (OSC)

In the interests of regulatory consistency DER has a set of optional standard conditions that can be imposed on works approvals and licences. DER will include optional standard conditions as necessary, and are likely to constitute the majority of conditions in any licence. The inclusion of any optional standard conditions is justified in Section 4 of this document.

Non standard conditions (NSC)

Where the proposed activities require conditions outside the standard conditions suite DER will impose one or more non-standard conditions. These include both premises and sector specific conditions, and are likely to occur within few licences. Where used, justification for the application of these conditions will be included in Section 4.



2 Administrative summary

Administrative details		
Application type	Works Approval <input type="checkbox"/> New Licence <input type="checkbox"/> Licence amendment <input checked="" type="checkbox"/> Works Approval amendment <input type="checkbox"/>	
Activities that cause the premises to become prescribed premises	Category number(s)	Assessed design capacity
	1	2,500 head
Application verified	Date: N/A	
Application fee paid	Date: N/A	
Works Approval has been complied with	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
Compliance Certificate received	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
Commercial-in-confidence claim	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Commercial-in-confidence claim outcome		
Is the proposal a Major Resource Project?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Was the proposal referred to the Environmental Protection Authority (EPA) under Part IV of the <i>Environmental Protection Act 1986</i> ?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Referral decision No: Managed under Part V <input type="checkbox"/> Assessed under Part IV <input type="checkbox"/>
Is the proposal subject to Ministerial Conditions?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Ministerial statement No: EPA Report No:
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the <i>Environmental Protection Act 1986</i>)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Department of Water consulted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Is the Premises within an Environmental Protection Policy (EPP) Area Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If Yes include details of which EPP(s) here.		
Is the Premises subject to any EPP requirements? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If Yes, include details here, eg Site is subject to SO ₂ requirements of Kwinana EPP.		



3 Executive summary of proposal and assessment

Welldon Beef is a small scale cattle feedlot located in the Shire of Williams, approximately 4.5 km east-southeast from the edge of the Williams town site. The feedlot was not constructed under a works approval. The operator also runs approximately 700 cattle as part of a breeding program in paddocks on the 2,100 ha property as an ancillary operation. The closest sensitive premise is a farmhouse, located approximately 1,470 m west of the feedlot premises boundary. The feedlot is accessible off Glenfield Road.

As part of this amendment, the Licensee intends to increase the stocking density of the animals from 17.6 to 14.1 m² per animal; increasing the head from 2,000 to 2,500 head. This is still within the National Feedlot Accreditation Scheme accepted range of 9-25 m²/head. No additional pens are to be constructed as part of this increase.

This partial Decision Document is compiled for the amendment of the existing Licence into the standardised REFIRE format and to give effect to amendments requested by the Licensee:

- Increase the stocking rate from 17.6 m²/head to 14.1 m²/head, thereby increasing the approved capacity from 2,000 head of cattle to 2,500; and
- remove the restriction on application of the solid waste within certain distance to the boundary premises.

The General conditions and Premises operations have been reviewed as part of this amendment.

The feedlot is located on the northern aspect in a landscape of long, gentle and undulating hill slopes and divides. Typical soil types in the area are clayey sands overlying granite rock. The feedlot is situated on shallow soils on a granitic ridge, with at least 20 m of solid granite present beneath the site. Average annual rainfall is 493 mm with the peak period between May and September. A number of watercourses intersect the premises, the closest being a minor non-perennial watercourse, located approximately 100 m to the south-west of the holding pens. The next closest watercourse is Fitts Creek, located approximately 1 km from the holding pens and the evaporation pond. Fitts Creek is a tributary of the Williams River which eventually flows into the Murray and the Peel Inlet.

The feedlot consists of 16 pens split between two rows. A 3 m concrete apron has been constructed in front of each of the feed bunks and around water troughs. A controlled drainage area has been established with catch drains present below each row of pens to capture and direct wastewater to the evaporation pond. The catch drains are lined with on-site clays with low permeability. The licensee currently has an active works approval (W5635/2014/1) to construct a sedimentation pond, and increase the size of the evaporation pond to 3 ML in preparation for the eventual construction of additional feedlot pens.

An existing freshwater diversion bank directs all fresh water from upslope of the feedlot into a fresh water dam.

Solid waste is regularly collected from the pens and stored in a static pile within the controlled drainage area until it is applied annually to paddocks for the production of crops within the Premises boundary. Dead animals are transported to a gravel pit approximately 3 km from the feedlot on Lot 5371 on Plan 117798. They are buried, covered with at least 500 mm of gravel and left to decompose. The gravel pit is assumed to have a very low permeability.

The main emissions and discharges that are likely to arise from the operation of the Welldon Beef Feedlot are odour, dust and the application of solid waste to land. Given the distance to the nearest sensitive receptors, any odour and dust that is produced through the operation of the feedlot are not expected to cause any nuisance. The application of solid waste to land is addressed through the Improvement Section of this licence.



4 Decision table

All applications are assessed in line with the *Environmental Protection Act 1986*, the *Environmental Protection Regulations 1987*, and DER's Operational Procedure on Assessing Emissions and Discharges from Prescribed Premises. Where other references have been used in making the decision they are detailed in the decision document.

DECISION TABLE

Works Approval / Licence section	Condition number W = Works Approval L = Licence	OSC or NSC	Justification (including risk description & decision methodology where relevant)	Reference documents
General conditions	L1.2.5	OSC	For details of DER's risk assessment and decision making refer to Appendix A.	L8659/2012/1
	L1.3.1 – L1.3.3	OSC		National Guidelines for Beef Cattle Feedlots in Australia (3rd Edition, 2012)
	L1.3.4	NSC		
Emissions general	L2.1.1	OSC	Descriptive limits will be set through condition 2.6.1 and 2.7.1 of the licence and therefore OSC regarding recording and investigation of exceedances of limits or targets has been included.	N/A
Point source emissions to air including monitoring	N/A	N/A	No point source emissions to air are expected from the operation of the feedlot. No conditions referring to point source air emissions or monitoring of these emissions are required to be added to the licence.	L8659/2012/1
Point source emissions to surface water including monitoring	N/A	N/A	No point source emissions to water are expected from the operation of the feedlot. No specified conditions referring to point source emissions water or the monitoring of such emissions are required to be added to the licence.	L8656/2012/1



DECISION TABLE

Works Approval / Licence section	Condition number W = Works Approval L = Licence	OSC or NSC	Justification (including risk description & decision methodology where relevant)	Reference documents
Point source emissions to groundwater including monitoring	N/A	N/A	No point source emissions to groundwater are expected from the operation of the feedlot. No specified conditions referring to point source emissions water or the monitoring of such emissions are required to be added to the licence.	L8656/2012/1
Emissions to land including monitoring	L1.3.2 L1.3.4 Table 4.1.1 (IR1 – 3)		The Licensee has requested the removal of the limitation on applying solid waste within 50 m of the premises boundary (licence condition 4(iv)), which forms the basis of this assessment. For details of DER's risk assessment and decision making refer to Appendix A.	L8656/2012/1 Guidelines for Environmental Management of Beef Cattle Feedlots in Western Australia (2002)
Fugitive emissions	2.6.1	OSC	The impact of fugitive emissions have not been reassessed as part of the partial amendment. Increased stocking rates in the pens will not likely reduce dust emissions. The previous Licence condition 5 relating to managing dust so that it does not unreasonably impact with the health, welfare, convenience or comfort or amenity of any person who is not on the premises, is carried over to the amended licence.	
Odour	2.6.1	OSC	The Licensee has requested the increase in cattle numbers and allowing the application of solid waste within close proximity of the Premises boundary. These may impact odour, and hence reassessed. For details of DER's risk assessment and decision making refer to Appendix A.	
Noise	N/A	N/A	Noise has not been reassessed as part of this amendment. As the previous licence did not impose controls on noise, no specified conditions have been included in this section. The <i>Environmental Protection (Noise) Regulations 1997</i> and SC 1.2.1 apply.	



DECISION TABLE

Works Approval / Licence section	Condition number W = Works Approval L = Licence	OSC or NSC	Justification (including risk description & decision methodology where relevant)	Reference documents
Monitoring general	N/A	N/A	The previous Licence (prior to this amendment) did not impose controls on monitoring and there is no requirement in the amended Licence.	
Monitoring of inputs and outputs	N/A	N/A	Monitoring requirements have not been reassessed as part of this amendment. As the previous licence did not require monitoring of inputs and outputs no specified conditions have been included in this section.	
Process monitoring	N/A	N/A	Monitoring requirements have not been reassessed as part of this amendment. As the previous licence did not require process monitoring no specified conditions have been included in this section.	
Ambient quality monitoring	N/A	N/A	Monitoring requirements have not been reassessed as part of this amendment. As the previous licence did not require ambient quality monitoring no specified conditions have been included in this section.	
Meteorological monitoring	N/A	N/A	Monitoring requirements have not been reassessed as part of this amendment. As the previous licence did not require meteorological monitoring no specified conditions have been included in this section.	
Improvements	Table 4.1.1		The previous licence (prior to this amendment) did require the the Licensee (condition 11, 12) to increase the capacity of the primary pond and install a sediment pond; this is being managed as part of Works Approval W5365/2014/1. Permeability validation was also required for the pens and burial pits (condition 13), and if not found to be suitable, these would need to be upgraded. Soil testing results provided show low permeability and low risk to the environment; this has been subsequently removed from the amended Licence.	L8656/2012/1
Information	5.2.2	OSC	Improvement conditions have been identified for the assessment of solid waste application to land, and irrigation application to ensure the application of solid waste and wastewater does not exceed the soil vulnerability category and impact the environment (IR1-3 in Table 4.1.1). SC 5.1.3 and 5.2.1 replaces condition 14 and 15 of the previous Licence. SC 5.1.4 has been included as a standard condition. Reporting of animals held on the premises, total number of animals buried, and application of solid wastes has also been included as part of 5.2.1 (Annual Environmental Report).	L8656/2012/1

DECISION TABLE

Works Approval / Licence section	Condition number W = Works Approval L = Licence	OSC or NSC	Justification (including risk description & decision methodology where relevant)	Reference documents
Licence Duration	N/A	N/A	The Licence is currently issued for a five year period. The duration of the licence has not been assessed as part of this amendment.	L8656/2012/1

5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration
30/10/2014	Proponent sent a copy of draft instrument	Proponent wanted Licence to be made clear that the regulation of the activities specifically related to the feedlot and not the entire premises as the feedlotting operation is ancillary to other farming operations within the same boundary.	Wording has been amended where appropriate to reflect the regulation of the feedlotting activity.



6 Risk Assessment

Note: This matrix is taken from the DER Corporate Policy Statement No. 07 - Operational Risk Management

Table 1: Emissions Risk Matrix

Likelihood	Consequence				
	Insignificant	Minor	Moderate	Major	Severe
Almost Certain	Moderate	High	High	Extreme	Extreme
Likely	Moderate	Moderate	High	High	Extreme
Possible	Low	Moderate	Moderate	High	Extreme
Unlikely	Low	Moderate	Moderate	Moderate	High
Rare	Low	Low	Moderate	Moderate	High



Appendix A

General Operations

Operation

Emission Description

Emission: Stormwater runoff from feedlot pens can contain organic and mineral enriched manure and spilt feed. Wastewater generated from feedlots can also have higher than normal background levels of salinity, COD and BOD. Stormwater contamination may occur from solid waste storage and application areas. Inappropriate storage of hydrocarbons/ chemicals or any leaks/ spills on the Premises can lead to stormwater contamination if not adequately contained and recovered. Increasing stocking density and premises design capacity will result in corresponding increase in quantity of manure and wastewater generated at the feedlot.

Impact: At the stocking densities typically used in feedlots, stormwater runoff can have increased nutrient and organic content, salinity, biochemical oxygen demand (BOD) and chemical oxygen demand (COD). Urine is often absorbed by drying manure to reduce leachate runoff. The feedlot is located in an area where average annual rainfall is 493 mm with the peak period between May and September. A number of watercourses intersect the premises, the closest being a minor non-perennial watercourse, located approximately 1,000 m to the north-east of the holding pens. Feedlot ramps up in October, meets production peaks January-May and ramps down to September. The up and down phases start and end at zero animals in the feedlot and a net movement of about 275 head per week. Therefore whilst it operates 12 months of the year it only meets peak loading for six months. There is potential for localised impact on surrounding surface water drainage systems.

Typical soil types where the feedlot is located is shallow sandy duplexes, with loamy sand to sandy loam over dense sandy clay (overlying granite rock). Much of the sandy topsoil was removed during the establishment of the pens. The soils have been tested and found to be clay/sandy clay with high plasticity (10-15%) with 20-25% fine grained sands, firm to very stiff to a depth of 1.3 m and underlain by granite / dolerite bedrock. These soils have been compacted by operating machinery and provide a low permeability barrier and unlikely risk to the environment. Depth to groundwater is at least 20 m near the pens while estimated to be 100 m deep on the gravel ridge where the deceased animals are buried, reducing potential impact on the environment.

Controls: The proponent directs stormwater generated within the controlled drainage area to an evaporation pond with sufficient freeboard to prevent overflow during extreme weather events (1 in 10 year storm). The feedlot pens and solid waste storage area is within the controlled drainage area. The Licensee has been authorised by Works Approval W5635/2014/1 (issued on 13/6/2014) to increase the capacity of the evaporation pond to 3 ML and construct a sedimentation pond that feeds into the evaporation pond. The expansion of the existing evaporation pond will provide further assurance that wastewater and contaminated runoff is captured and appropriately contained.

Risk Assessment

Consequence: Minor

Likelihood: Possible

Risk Rating: Moderate

Regulatory Controls

Previous Licence (prior to this amendment) condition 2 and 3 relating to stormwater and wastewater management has been replaced with NSC 1.2.5 and OCS 1.3.1. L1.2.5 is a non-standard condition that specifies storm water management specifically related to the feedlot (the proponent also runs a cattle breeding program within the premises which the Licensee will not be able to comply with if all activities of the premises were considered. The condition also requires stormwater that has come



into contact with waste from the feedlot operations to be considered and managed as leachate and be directed to the wastewater treatment system.

OCS 1.3.2 specifies that the feedlot pens and stockpile storage areas are to be located within the controlled drainage area while OCS 1.3.3 has been added to the Licence to ensure the Licensee maintains sufficient freeboard on the evaporation pond to prevent overflows during extreme weather conditions.

NSC1.3.4 stipulates requirements for the management of waste (i.e. stockpiling of feedlot solids and pond sludge, and carcass management) which replaces condition 7 in the former Licence. This is usually an OSC but wording has been altered to reflect that the management of waste specifically relates to the cattle feedlot operation.

SC 1.2.3 and 1.2.4 relates to the storage of environmentally hazardous materials and the management of spills and replaces condition 9 and 10 from previous licence.

Residual Risk

Consequence: Insignificant

Likelihood: Unlikely

Risk Rating: Low

Emissions to land including monitoring

Emission description

Emissions: Solid waste is stockpiled and applied annually (once a year) to paddocks within and outside the premises. The licence does have provisions to allow the irrigation of treated wastewater but this is not currently undertaken. The solid waste will include both stabilised manure and raw manure with a high nutrient concentration (natural fertiliser) and high BOD content (with the potential for causing odour) and pathogens.

Impacts: The Licensee applies feedlot solids to land. The feedlot is located in a rural agricultural landscape. Excessive loading rates of the manure can clog the pore spaces in soil profiles with bacterial slimes and limit the infiltration of water and air into the soil profile leading to anaerobic conditions. Other impacts of excessive application of solids include increase in soil salinity, nutrient runoff into the environment, generation of leachate leading to groundwater contamination. The Licensee does not have a written management plan to determine application rates based on suitability of soils, crop types and use etc. There is potential for localised impact on soil quality and minor breach of legal requirements. Manure is stockpiled on the Premises which can result in passive composting however operators do not actively manage the composting process. Inadequate composting or pasteurisation process can lead to ineffective elimination of pathogens. Application of treated wastewater on the same area will increase the risk of impact to waterways (local short-term eutrophication) through potential runoff.

Application of solid waste within 2 m of the boundary (in line with cropping regime), while not consistent with the Guidelines for Environmental Management of Beef Cattle Feedlots in Western Australia (2002) is not likely to cause odour or over-fertilisation concern as neighbours also crop adjoining paddocks. Furthermore, cattle also frequent all of the paddocks as part of the farming enterprise, which also results in application within close proximity to the boundary. The adjoining properties also crop and run livestock. Impacts from this altered application regime will be insignificant.

Controls: Application is undertaken once annually prior to seeding of paddocks to maximise uptake of nutrients and this eliminates the need to apply artificial fertilisers. Rates are applied according to identified cropping requirements; these however need to be documented.



Risk Assessment

Consequence: Minor

Likelihood: Likely

Risk: Moderate

Regulatory Control

OSC1.3.4 specifies operational requirements for the application of solid waste to land to avoid over-fertilisation and protection of surface water and groundwater.

The suitability of application based on soil types are yet to be determined; this assessment is required as an improvement condition (IR1). The licensee will be required to conduct a Solids Application to Land Assessment to ensure the application rates do not exceed the soil vulnerability category (IR1). The licence currently does not have limits for nutrient loading. Once the report is available, limits for nutrient loading may be considered.

The removal of the 50 m restriction to apply solid waste within the premises boundary is considered to have a low environmental risk and accepted. Buffer distances to defined watercourses and wetlands will remain (OSC1.3.4).

The previous licence (prior to amendment) condition 8 allowed irrigation of wastewater in accordance with a DER approved Nutrient Irrigation Management Plan. Irrigation is currently not being undertaken but the option remains. This condition has been reworded in section 4.1 (IR2) to require an Irrigation Assessment Report to be submitted to DER for approval prior to irrigating wastewaters. IR 3 has also been included to review the impacts of both the solids and wastewater, if applied to the same area.

Residual Risk

Consequence: Insignificant

Likelihood: Unlikely

Risk: Low

Odour

Emission Description

Emission: Odour emissions may result from inappropriate management of waste (infrequent cleaning, spoiled grainfeed), increased animal numbers (stocking rates), not covering carcasses, anaerobic conditions within the solidwaste stockpiles and the application of solids to land. Odour levels may increase slightly as of the increased stocking rates and solid waste generation and storage. Solid waste application rates to paddocks are expected to remain the same.

Impact: The nearest neighbours (farm dwelling) is approximately 1.47km away. Application of solid waste may be of short term concern. It is applied over a few days (annually) (short duration in autumn) and odours are likely to be quickly vaporised. Poor waste management may cause localised minor reversible impact consequences. No complaints have been received relating to odour from existing operations. The National Guidelines for Beef Cattle Feedlots in Australia separation factor (s-factor) calculation for 2,000SCU (current situation) is approximately 490 m while a 2,500 SCU will require a separation distance of 600 m, demonstrating that odour will continue to be expected to be an insignificant issue for this Premises.

Control: The existing management plan ensures operations adequately address odour through appropriate waste management strategies, which includes regular cleaning of pens and burial of carcasses.

Risk Assessment

Consequence: Minor

Likelihood: Unlikely



Risk: Low

Regulatory Control

Licence condition 6 relates to managing odour so that it does not unreasonably impact with the health, welfare, convenience or comfort or amenity of any person who is not on the premises, is replaced with a similar condition (2.7.1) in the amended licence.

OCS1.3.4 specifies management requirements relating to the management of carcasses and application of solid waste to manage odour.

Residual Risk

Consequence: Minor

Likelihood: Rare

Risk: Low