



Licence

Environmental Protection Act 1986, Part V

Licensee: **Dardanup Butchering Company Nominees Pty Ltd**

Licence: **L5177/1989/13**

Registered office: 100 Wimbridge Road
 PICTON WA 6229

ACN: 009 070 624

Premises address: 100 Wimbridge Road
 PICTON WA 6229
 Being Lot 100 on Plan 61127 as depicted in Schedule 1

Issue date: Thursday, 24 September 2015

Commencement date: Thursday, 1 October 2015

Expiry date: Wednesday, 30 September 2020

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
15	Abattoir: premises on which animals are slaughtered	1 000 tonnes or more per year	30 000 tonnes per annual period (live weight)
55	Livestock saleyard or holding pen: premises on which live animals are held pending their sale, shipment or slaughter.	10 000 animals or more per year	220 000 animals per annual period

Conditions

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

.....
Jonathan Bailes
Manager Licensing (Process Industries)
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 regulates 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

Dardanup Butchering Company Nominees Pty Ltd (DBC) operates the DBC Abattoir located approximately 6 km southeast of the Bunbury CBD and 160 km south of Perth. The abattoir was established in 1950 and is one of the largest multi-species meat processing facilities in Western Australia, with an average daily kill of 120 cattle, 540 sheep/lambs and 120 pigs.

Cattle hides and sheep/lamb skins are drum salted on site for short term preservation before being taken off site to Perth Hide and Skin Exports in Fremantle for further processing. Inedible material is taken offsite to Talloman in Hazelmere for rendering.

Process water, including water supply to livestock lairages is sourced from the Aqwest Bunbury water supply. Water for low quality purposes is sourced from an on-site bore.

Wastewater from processing activities is collected in a sump after physical treatment using a hasher-washer/trammel and various wire screens for solids removal to rendering. The wastewater then passes through a dissolved air floatation (DAF) system to a tank and pond treatment system which consists of a 4.5 ML EEI High-Rate Anaerobic Reactor Technology (HART) tank (anaerobic tank), one Advanced Nutrient Removal Unit Process pond (Pond 1) and one Phosphorus Removal and Holding Pond (Pond 2). Some of the treated water is then disinfected and reused in the yard and for lairage washdown while the rest is used to seasonally irrigate grasses on the premises.

The premises is located on the Swan Coastal Plain in low relief that is poorly drained and subject to seasonal inundation (dampland). The soils at the site are sandy and clayey swamp flats with the chief soils being leached sands. Approximately 70% of the premises is classified as having a high to moderate risk of acid sulfate soils. Surrounding land uses include industry, natural bushland, and pasture; with the premises land being zoned as rural. The Ferguson River is located 1 km to the south and the Leschenault inlet is approximately 2.3 km to the north. The premises is also located approximately 200 m east of a wetland subject to the provisions of the *Environmental Protection (Swan Coastal Plain Lakes) Policy 1992*. The water table fluctuates seasonally by approximately 1 – 2 m and intersects the surface in many parts of the surrounding area in winter where surface expressions (such as sumplands/damplands) occur. The site is also classified as 'possibly contaminated – investigation required' in regards to the *Contaminated Sites Act 2003*.

The closest sensitive premises is residential housing located approximately 380 m northwest of the premises boundary and approximately 850 m north northwest of the abattoir buildings. The main emissions and discharges from the premises are emissions to land through irrigation.

This Licence is the successor to licence L5177/1989/12 and includes changes to update the licence to the current template.



The licences and works approvals issued for the Premises since 26/09/1997 are:

Instrument log		
Instrument	Issued	Description
L5177/1989/02	26/09/1997	Licence reissue
L5177/1989/03	21/04/1999	Licence reissue
L5177/1989/04	11/09/2000	Licence reissue
L5177/1989/05	02/10/2001	Licence reissue
L5177/1989/06	27/09/2002	Licence reissue
L5177/1989/06	03/06/2003	Licence amended
L5177/1989/07	22/09/2003	Licence reissue
L5177/1989/08	07/09/2004	Licence reissue
L5177/1989/09	29/08/2005	Licence reissue
L5177/1989/10	25/09/2008	Licence reissue
L5177/1989/11	22/09/2011	Licence reissue
L5177/1989/12	18/09/2014	Licence reissue
L5177/1989/13	24/09/2015	Licence reissue and update to current template

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*;

‘**AHD**’ means the Australian height datum;

‘**annual period**’ means the inclusive period from 1 January until 31 December in the same year;

‘**AS/NZS 5667.1**’ means the Australian Standard AS/NZS 5667.1 *Water Quality – Sampling – Guidance of the Design of sampling programs, sampling techniques and the preservation and handling of samples*;

‘**AS/NZS 5667.10**’ means the Australian Standard AS/NZS 5667.10 *Water Quality – Sampling – Guidance on sampling of waste waters*;

‘**AS/NZS 5667.11**’ means the Australian Standard AS/NZS 5667.11 *Water Quality – Sampling – Guidance on sampling of groundwaters*;

‘**averaging period**’ means the time over which a limit is measured or a monitoring result is obtained;

‘**CEO**’ means Chief Executive Officer of the Department of Environment Regulation;



‘CEO’ for the purpose of correspondence means;

Chief Executive Officer
Department Administering the Environmental Protection Act 1986
Locked Bag 33
CLOISTERS SQUARE WA 6850
Email: info@der.wa.gov.au;

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

‘hardstand’ means a surface with a permeability of 10^{-9} metres/second or less;

‘Licence’ means this Licence numbered L5177/1989/13 and issued under the Act;

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

‘NATA’ means the National Association of Testing Authorities, Australia;

‘NATA accredited’ means in relation to the analysis of a sample that the laboratory is NATA accredited for the specified analysis at the time of the analysis;

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

‘quarterly’ means the 4 inclusive periods from 1 January to 31 March, 1 April to 30 June, 1 July to 30 September and 1 October to 31 December in the same year;

‘Schedule 1’ means Schedule 1 of this Licence unless otherwise stated;

‘Schedule 2’ means Schedule 2 of this Licence unless otherwise stated;

‘spot sample’ means a discrete sample representative at the time and place at which the sample is taken; and

‘usual working day’ means 0800 – 1700 hours, Monday to Friday excluding public holidays in Western Australia.

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.

1.1.5 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 General conditions

1.2.1 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.

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



1.2.3 The Licensee shall:

- (a) implement all practical measures to prevent stormwater run-off becoming contaminated by the activities on the Premises; and
- (b) treat contaminated or potentially contaminated stormwater as necessary prior to being discharged from the Premises.¹

Note1: *The Environmental Protection (Unauthorised Discharges) Regulations 2004* make it an offence to discharge certain materials into the environment.

1.3 Premises operation

1.3.1 The Licensee shall ensure that all process wastewaters and contaminated or potentially contaminated waters 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		
Vessel or compound	Material	Requirements
Screw extractor	Abattoir process wastewater and all other wastewaters not directed to the rotary screen	Located within a concrete lined sump
Rotary screen	Wastewater from the small stockyards, skin shed, cattle yards and by-products load out	Located on a concrete hardstand area that drains back to the wastewater treatment system
Metal bin	Solids from screw extractor	Located on a concrete hardstand area that drains back to wastewater treatment system
Metal bin	Solids from rotary screen	Located on a concrete hardstand area that drains back to wastewater treatment system
Truck / bin	Solid waste scraped from top of DAF	Located on a concrete hardstand area that drains back to wastewater treatment system
Truck / trailers	Material for offsite rendering	Located on a concrete hardstand area
Hopper / bins	Paunch	Located on a concrete hardstand area that drains back to wastewater treatment system
Fiberglass tank	Blood	Located in concrete bunded area
Skin shed	Skins / Hides	Undercover in concrete floor shed with wastewater directed back to wastewater treatment system
Dissolved Air Floatation tank (DAF)	Wastewater from the screw extractor and rotary screen	Impermeable tank on bunded hardstand area
Anaerobic tank (EEI High-Rate Anaerobic Reactor Technology (HART) tank)	Wastewater from the DAF	Impermeable tank
Pond 1 (Advanced Nutrient Removal Unit Process (ANRUP) Pond)	Wastewater from Anaerobic tank	HDPE lined to achieve permeability of less than 1×10^{-9} m/s
Pond 2 (Phosphorus Removal and Holding Pond)	Wastewater from Pond 1	HDPE lined to achieve permeability of less than 1×10^{-9} m/s
Geobags	Sludge from Anaerobic tank	Geobags located on bunded limestone area that drains to a sump where wastewater is directed to Pond 1



- 1.3.3 The Licensee shall ensure that where wastes produced on the Premises are not taken off-site for lawful use or disposal, they are managed in accordance with the requirements in Table 1.3.2.

Table Error! Reference source not found.: Management of waste		
Waste type	Disposal strategy	Operational requirements
Treated water	Irrigation	The Licensee shall manage the discharge of treated water such that: <ul style="list-style-type: none">(i) treated water is evenly distributed over the irrigation area;(ii) no soil erosion or ponding of wastewater occurs;(iii) there is no direct runoff, spray drift or discharge beyond the irrigation area;(iv) healthy vegetation cover is maintained over the irrigation area;(v) irrigation shall not occur within fifty (50) metres of any defined watercourse or drain; and(vi) discharge does not occur during periods of rainfall or onto flooded area(s).

- 1.3.4 The Licensee shall manage all wastewater treatment ponds such that:
- (a) a 300 mm freeboard is maintained at all times;
 - (b) stormwater runoff resulting from site drainage shall be prevented from entering the ponds or causing erosion of the outer pond embankment;
 - (c) vegetation and floating debris (emergent or otherwise) does not encroach onto pond surfaces or inner pond embankments; and
 - (d) trapped overflows are maintained on the discharge point(s) to prevent carryover of surface floating matter to the subsequent pond or irrigation area.

2 Emissions

2.1 General

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

2.2 Emissions to land

- 2.2.1 The Licensee shall ensure that where waste is emitted to land from the emission points in Table 2.2.1 and identified on the map of emission points in Schedule 1 it is done so in accordance with the conditions of this Licence.

Table 2.2.1: Emissions to Land		
Emission point reference	Description and reference on Map of emission points and monitoring locations	Source including abatement
L1	Irrigation Area	Treated water from wastewater treatment system

- 2.2.2 The Licensee shall not cause or allow emissions to land greater than the limits listed in Table 2.2.2.

Table 2.2.2: Emission limits to land			
Emission point reference	Parameter	Limit (including units)	Averaging period
L1	Total Nitrogen	250 kg/ha	Annual
	Total Phosphorus	20 kg/ha	Annual
	Biochemical Oxygen Demand	30 kg/ha	Daily



3 Monitoring

3.1 General monitoring

3.1.1 The licensee shall ensure that:

- (a) all water samples are collected and preserved in accordance with AS/NZS 5667.1;
- (b) all wastewater sampling is conducted in accordance with AS/NZS 5667.10;
- (c) all groundwater sampling is conducted in accordance with AS/NZS 5667.11; and
- (d) all laboratory samples are submitted to and tested by a laboratory with current NATA accreditation for the parameters being measured.

3.1.2 The Licensee shall ensure that quarterly monitoring is undertaken at least 45 days apart.

3.2 Monitoring of emissions to land

3.2.1 The Licensee shall undertake the monitoring in Table 3.2.1 according to the specifications in that table.

Table 3.2.1: Monitoring of emissions to land					
Emission point reference	Monitoring point reference and location on Map of emission points and monitoring locations	Parameter	Units	Averaging Period	Frequency
L1	Pond 2 (Phosphorus Removal and Holding Pond)	Volumetric flow rate	m ³	Monthly	Continuous
		pH	pH units	Spot sample	
		Total Dissolved Solids	mg/L		
		Total Suspended Solids			
		Biochemical Oxygen Demand			
		Total Nitrogen			
		Total Phosphorus			
		Ammonium-nitrogen			
		Nitrate + Nitrite-nitrogen			

3.3 Monitoring of inputs and outputs

3.3.1 The Licensee shall undertake the monitoring in Table 3.3.1 according to the specifications in that table.

Table 3.3.1: Monitoring of inputs and outputs				
Input / Output	Parameter	Units	Averaging period	Frequency
Livestock received at premises	Animals	Number	Annual	Each batch arriving at premises
Animals to be slaughtered	Live weight of animals	Tonnes (estimated)	Annual	Estimated from number of livestock received at premises

3.4 Ambient environmental quality monitoring

3.4.1 The Licensee shall undertake the monitoring in Table 3.4.1 according to the specifications in that table and record and investigate results that do not meet any limit specified.



Table 3.4.1: Monitoring of ambient groundwater quality

Monitoring point reference and location on Map of emission points and monitoring locations	Parameter	Units	Averaging period	Frequency
MB1, MB2 and MB3	Standing water level	m(AHD)	Spot sample	Quarterly
	pH	pH units		
	Total Dissolved Solids	mg/L		
	Total Suspended Solids	mg/L		
	Total Nitrogen	mg/L		
	Total Phosphorus	mg/L		

4 Improvements

4.1 Improvement program

4.1.1 The Licensee shall complete the improvements in Table 4.1.2 by the date of completion in Table 4.1.2.

Table 4.1.1: Improvement program

Improvement reference	Improvement	Date of completion
IR1	<p>The Licensee shall submit to the CEO an updated Nutrient Irrigation Management Plan (NIMP) prepared in accordance with <i>Water Quality Protection Note 33 Nutrient and Irrigation Management Plans</i>, Department of Water (June 2010). The NIMP shall include, but not be limited to:</p> <ul style="list-style-type: none"> (i) An assessment of the adequacy of the irrigation area based on: <ul style="list-style-type: none"> (a) Hydraulic loading rates; (b) Nutrient loading rates; and (c) Biochemical Oxygen Demand loading rates; (ii) A monthly water balance assessing the adequacy of the storage capacity of the wastewater treatment system; (iii) A nutrient balance which clearly identifies the availability of nutrients from each source, vegetation uptake rates, soil storage capacity, and environmental loss during the assessment year and accounts for any nutrient credits for following years; (iv) An assessment of the total nutrient application rate to the irrigation (kg/ha/year) based on (i); (v) A contingency plan for storage of wastewater during wet weather periods when irrigation may not occur or irrigation volumes may be lower; (vi) A qualitative and quantitative risk assessment to determine acceptable nutrient application rates to minimise the potential of soil, surface water or groundwater contamination; (vii) Identification of any improvements required; and (viii) Details of any proposed management measures, including timelines that can be implemented to reduce the risk of potential environmental impacts that may occur as a result of maximum recommended nutrient loading rates being exceeded. 	31 March 2016



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
Table 3.2.1	pH, total dissolved solids, total suspended solids, biochemical oxygen demand, total nitrogen, total phosphorus, ammonium-nitrogen, nitrate + nitrite-nitrogen	None specified
Table 3.3.1	Livestock received at premises (number of animals), animals to be slaughtered (live weight in tonnes (estimated))	None specified
Table 3.4.1	Standing water level, pH, total dissolved solids, total suspended solids, total nitrogen, total phosphorus	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



- 5.2.2 The Licensee shall ensure that the Annual Environmental Report also contains an assessment of the information contained within the report against previous monitoring results and Licence limits.
- 5.2.3 The Licensee shall submit the information in Table 5.2.3 to the CEO according to the specifications in that table.

Table 5.2.3: Non-annual reporting requirements				
Condition or table (if relevant)	Parameter	Reporting period	Reporting date (after end of the reporting period)	Format or form
-	Copies of original monitoring reports submitted to the Licensee by third parties	Not Applicable	Within 14 days of the CEO's request	As received by the Licensee from third parties

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. Part B: As soon as practicable	N1

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

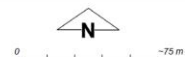
Premises map

The Premises is shown in the maps below. The pink line depicts the Premises boundary.



LEGEND

— Road Centrelines
Bunbury 50cm Orthomosaic -
Landgate 2008



Scale 1:3000
(Approximate when reproduced at A4)

Geocentric Datum Australia 1994

Note: the data in this map have not been
projected. This may result in geometric
distortion or measurement inaccuracies.

Prepared by: DER
Prepared for:
Date: 15/09/2015 1:57:24 PM

Information derived from this map should be
confirmed with the data custodian acknowledged
by the agency acronym in the legend.



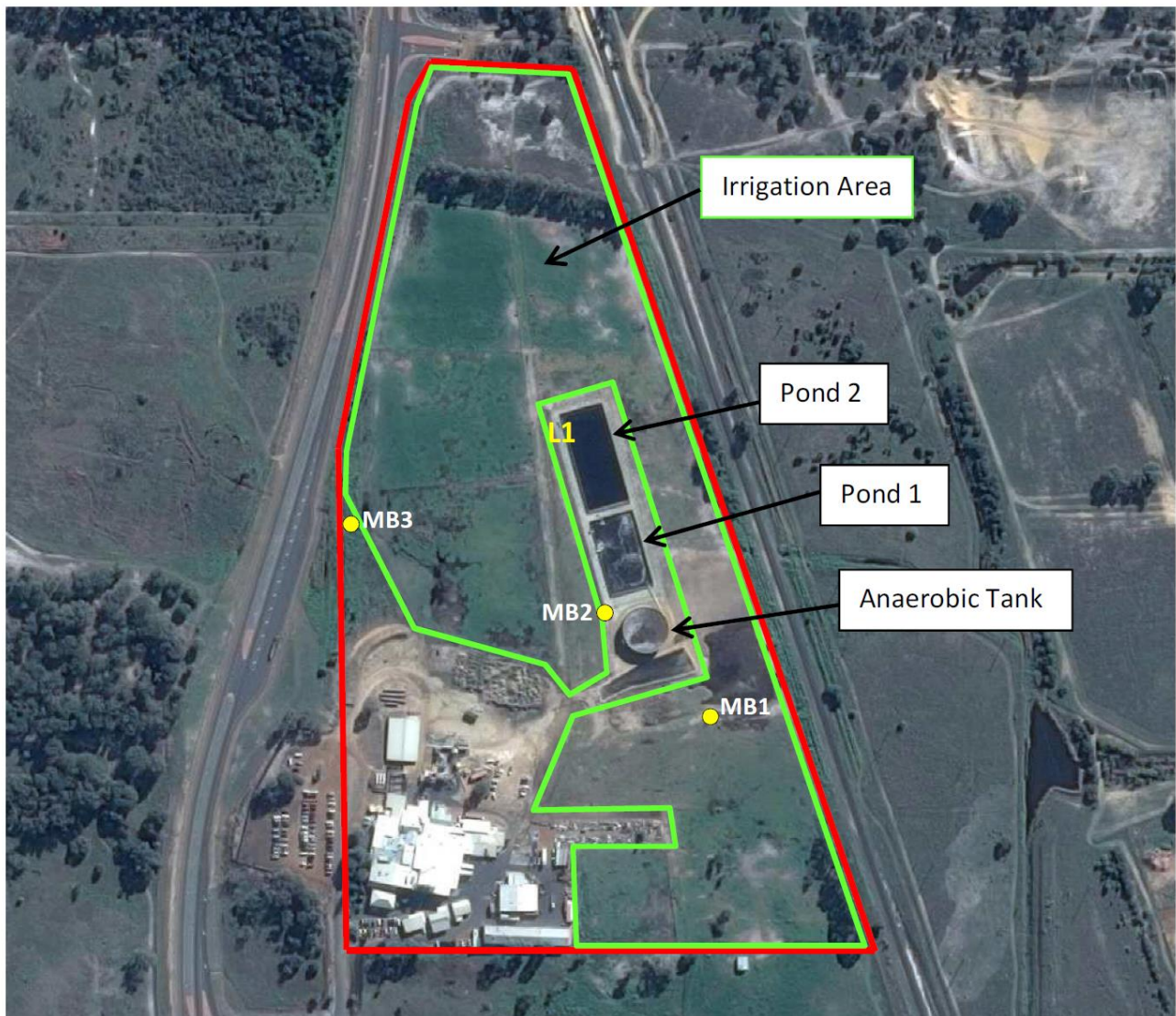
Government of Western Australia
Department of Environment Regulation

WA Crown Copyright 2002

* Project Data. This data has not been quality assured. Please contact map author for details.

Map of emission points and monitoring locations

The location of the emission point defined in Table 2.2.1 is shown below. The locations of the monitoring points defined in Tables 3.2.1 and 3.4.1 are shown below.





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: Trading as:	ABN:
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: _____

NAME:
(printed) _____

POSITION: _____

DATE: ____/____/____

SEAL (if signing under seal)

SIGNATURE: _____

NAME:
(printed) _____

POSITION: _____

DATE: ____/____/____



Licence: L5177/1989/13
Form: N1

Licensee: Dardanup Butchering Company Nominees Pty Ltd
Date of breach:

Notification of detection of the breach of a limit.

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	L5177/1989/13
Name of operator	Dardanup Butchering Company Nominees Pty Ltd
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	

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 Dardanup Butchering Company Nominees Pty Ltd	
Date	



Decision Document

Environmental Protection Act 1986, Part V

Proponent: **Dardanup Butchering Company Nominees Pty Ltd**

Licence: **L5177/1989/13**

Registered office: 100 Wimbridge Road
PICTON WA 6229

ACN: 009 070 624

Premises address: 100 Wimbridge Road
PICTON WA 6229
Being Lot 100 on Plan 61127 as depicted in Schedule 1

Issue date: Thursday, 24 September 2015

Commencement date: Thursday, 1 October 2015

Expiry date: Wednesday, 30 September 2020

Decision

Based on the assessment detailed in this document the Department of Environment Regulation (DER) has decided to issue a licence. DER considers that in reaching this decision it has taken into account all relevant considerations.

Decision Document prepared by: Elizabeth Whisson
Licensing Officer

Decision Document authorised by: Jonathan Bailes
Delegated Officer



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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.



2 Administrative summary

Administrative details		
Application type	Works Approval <input type="checkbox"/> New Licence <input checked="" type="checkbox"/> Licence amendment <input type="checkbox"/> Works Approval amendment <input type="checkbox"/>	
Activities that cause the premises to become prescribed premises	Category number(s)	Assessed design capacity
	15: Abattoir	30 000 tonnes per annual period (live weight)
	55: Livestock saleyard or holding pen	220 000 animals per annual period
Application verified	Date: 5/08/2015	
Application fee paid	Date: 14/08/2015	
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 type="checkbox"/>	
Is the Premises within an Environmental Protection Policy (EPP) Area Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> The Premises is approximately 200 m east of a wetland subject to the provisions of the <i>Environmental Protection (Swan Coastal Plain Lakes) Policy 1992</i> (Swan Coastal Plain Lakes EPP).		
Is the Premises subject to any EPP requirements? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> The Swan Coastal Plain Lakes EPP prohibits the unauthorised mining, filling, draining or effluent discharge into these lakes.		



3 Executive summary of proposal and assessment

Dardanup Butchering Company Nominees Pty Ltd (DBC) operates the DBC Abattoir located approximately 6 km southeast of the Bunbury CBD and 160 km south of Perth. The abattoir was established in 1950 and is one of the largest multi-species meat processing facilities in Western Australia, with an average daily kill of 120 cattle, 540 sheep/lambs and 120 pigs.

Cattle hides and sheep/lamb skins are drum salted on site for short term preservation before being taken off site to Perth Hide and Skin Exports in Fremantle for further processing. Inedible material is taken offsite to Talloman in Hazelmere for rendering.

Process water, including water supply to livestock lairages is sourced from the Aqwest Bunbury water supply. Water for low quality purposes is sourced from an on-site bore.

Wastewater from processing activities is collected in a sump after physical treatment using a hasher-washer/trammel and various wire screens for solids removal to rendering. The wastewater then passes through a dissolved air floatation (DAF) system to a tank and pond treatment system which consists of a 4.5 ML EEI High-Rate Anaerobic Reactor Technology (HART) tank (anaerobic tank), one Advanced Nutrient Removal Unit Process pond (Pond 1) and one Phosphorus Removal and Holding pond (Pond 2). Some of the treated water is then disinfected and reused in the yard and for lairage washdown while the rest is used to seasonally irrigate grasses on the premises.

The premises is located on the Swan Coastal Plain in low relief that is poorly drained and subject to seasonal inundation (dampland). The soils at the site are sandy and clayey swamp flats with the chief soils being leached sands. Approximately 70% of the premises is classified as having a high to moderate risk of acid sulfate soils. Surrounding land uses include industry, natural bushland, and pasture; with the premises land being zoned as rural. The Ferguson River is located 1 km to the south and the Leschenault inlet is approximately 2.3 km to the north. The premises is also located approximately 200 m east of a wetland subject to the provisions of the *Environmental Protection (Swan Coastal Plain Lakes) Policy 1992*. The water table fluctuates seasonally by approximately 1 – 2 m and intersects the surface in many parts of the surrounding area in winter where surface expressions (such as sumplands/damplands) occur. The site is also classified as 'possibly contaminated – investigation required' in regards to the *Contaminated Sites Act 2003*.

The closest sensitive premises is residential housing located approximately 380 m northwest of the premises boundary and approximately 850 m north northwest of the abattoir buildings. The main emissions and discharges from the premises are emissions to land through irrigation.



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	Justification (including risk description & decision methodology where relevant)	Reference documents
General conditions	L1.2.3	<p>Operation</p> <p><u>Emission Description</u> <i>Emission:</i> Stormwater contaminated with animal and process waste from the holding yards and abattoir and overtopping of the wastewater treatment system ponds. <i>Impact:</i> Contamination of surrounding land and surface water drainage systems. Potential impacts on ecology of surface water from the addition of nutrients. The Ferguson River is located 1 km south of the premises and a wetland subject to the provisions of the <i>Environmental Protection (Swan Coastal Plain Lakes) Policy 1992</i> is located 200 m west of the premises. <i>Controls:</i> All stormwater runoff from areas where there is potential for contamination, including the abattoir and livestock holding yards is directed into the wastewater treatment system via bunding, sumps and sloped hardstand areas. Abattoir operations are conducted within enclosed sheds. Uncontaminated stormwater is directed to leach drains. Wastewater treatment ponds are checked every second day. The ponds also have a high level alarm and are monitored via CCTV. Flows can be controlled remotely by an engineer located in Perth. A high level alarm is installed on wastewater collection sumps.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Moderate</p>	Application supporting documentation



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		<p><u>Regulatory Controls</u> Condition L1.2.3 has been included on the licence to ensure the Licensee continues to manage stormwater runoff appropriately. Condition L1.3.4 has been included on the licence to ensure the wastewater treatment ponds are managed appropriately to prevent overtopping.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Moderate</p>	
Premises operation	L1.3.1-1.3.2	<p>Operation <u>Emission Description</u> <i>Emission:</i> Discharge of contaminated wastewater or partially treated wastewater from the abattoir, wastewater treatment system or livestock holding yards. <i>Impact:</i> Contamination of surrounding land and surface water systems due to high nutrient levels in wastewaters and organic wastes from the abattoir. High nutrient levels can result in eutrophication of surface water systems. The Ferguson River is located 1 km south of the premises and a wetland subject to the provisions of the <i>Environmental Protection (Swan Coastal Plain Lakes) Policy 1992</i> is located 200 m W of the premises. <i>Controls:</i> The wastewater treatment system area, abattoir and associated livestock holding yards are concrete lined, bunded and sloped to prevent runoff of contaminated water or discharge of animal waste to the environment. All wash down water and animal waste from the abattoir and livestock holding yards is directed via drainage, bunding and PVC/poly piping to either the screw extractor or rotary screen before being directed to the dissolved air floatation (DAF). Abattoir and screening wastes are collected in metal bins or a truck/trailer located on concrete hardstand areas before being removed for offsite disposal. Blood is separated from the wastewater stream as and directed to a bunded fibreglass tank located on a concrete hardstand area.</p>	Application supporting documentation



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		<p><u>Risk Assessment</u> <i>Consequence:</i> Moderate <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Moderate</p> <p><u>Regulatory Controls</u> Condition L1.3.1 has been included to ensure that all process wastewater and contaminated or potentially contaminated waters are directed to the wastewater treatment system. Condition L1.3.2 has been included on the Licence to ensure that waste is stored appropriately within maintained infrastructure.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Moderate</p>	
Emissions general	L2.1.1	Descriptive limits will be set through condition 2.2.2 of the licence and therefore condition regarding recording and investigation of exceedances of limits has been included.	N/A
Emissions to land including monitoring	L2.2.2 L3.2.1	For DER's assessment of emissions to land including monitoring see Appendix A.	Application supporting documentation
Fugitive emissions	N/A	<p>Operation <u>Emission Description</u> <i>Emission:</i> Potential dust emissions from the unloading of cattle and vehicle movements onsite. <i>Impact:</i> Potential nuisance for neighbours. The closest sensitive premises to the livestock holding yards is approximately 800 NW. The wind direction throughout the majority of the year in the morning is an easterly and is usually a westerly during the afternoon. The wind strength, on average, ranges from 12 to 23 km/hr throughout the year. No complaints relating to dust have been received by DER.</p>	General provisions of the <i>Environmental Protection Act 1986</i>



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		<p><i>Controls:</i> The unloading and truck turn-a-round area is compacted limestone with the livestock holding yards concrete based. The truck unloading area is a concrete apron with a bitumen hardstand. Most other trafficable areas associated with the abattoir facilities are concrete based. Limestone areas are treated using a spray unit if required.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Insignificant <i>Likelihood:</i> Possible <i>Risk Rating:</i> Low</p> <p><u>Regulatory Controls</u> Given the low risk, no specified conditions relating to fugitive emissions have been included in the licence. The general provisions of the <i>Environmental Protection Act 1986</i> are considered sufficient to regulate the risk.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Insignificant <i>Likelihood:</i> Possible <i>Risk Rating:</i> Low</p>	
Odour	N/A	<p>Operation</p> <p><u>Emission Description</u> <i>Emission:</i> Potential for odour from the abattoir, lairage yards, wastewater treatment system including sumps and irrigation area. <i>Impact:</i> Discharge of odour to the atmosphere outside the premises boundary causing amenity impacts in the nearby community. The nearest sensitive premises is approximately 850 m NW of the abattoir buildings. There have been no odour complaints received by DER in the last 3 years. <i>Controls:</i> The abattoir operations are conducted within enclosed buildings. The lairage yards and wastewater treatment areas are hosed down and sumps checked on a daily basis. The wastewater treatment system anaerobic tank and ponds are checked every</p>	General Provisions of the <i>Environmental Protection Act 1986</i>



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		<p>second day. Solid wastes are taken offsite on a daily basis and rendering material is taken offsite twice daily. Blood is stored in a sealed fibreglass tank and emptied once a day. DBC also has an Environmental Management Plan that includes management of odour.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Moderate</p> <p><u>Regulatory Controls</u> No controls have been included on the licence. The general provisions of the <i>Environmental Protection Act 1986</i> are considered sufficient to regulate the risk.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Moderate</p>	
Monitoring general	L3.1.1	Condition L3.1.1 is included to ensure sampling is undertaken in accordance with relevant standards and analysis is carried out by a NATA accredited laboratory. Condition L3.1.2 is included to ensure adequate time between sampling events.	N/A
Monitoring of inputs and outputs	L3.3.1	Inputs are required to be monitored at the site that includes the number of livestock received at the livestock holding yards. The live weight of animals to be slaughtered is estimated, based on the number and type of livestock received at the premises. This is to ensure that the approved premises production or design capacity of the premises is not exceeded.	Application supporting documentation
Ambient quality monitoring	L3.4.1	Ambient quality monitoring is discussed in Appendix A.	N/A



DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
Improvements	L4.1.1	An improvement condition for the Licensee to submit an updated NIMP has been included on the licence (refer to Appendix A).	N/A
Information	L5.2.2 L5.3.1	Condition 5.2.2 has been included on the licence to ensure that the Licensee provides data that may detect trends on whether the premises is having an impact on the surrounding environment. Condition 5.3.1 has been included on the licence to ensure that the CEO is notified of any limit exceedances.	
Licence Duration	N/A	The overall environmental risk of this premises is categorised as moderate. The License has been issued for a period of five years as this allows the Licensee time to update their Nutrient and Irrigation Management Plan and continue to monitor the impact of irrigation of treated wastewater on the surrounding environment.	N/A



5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration
24/08/2015	Application advertised in West Australian (or other relevant newspaper)	No comments received.	N/A
21/09/2015	Proponent sent a copy of draft instrument	Comments received included administrative amendments, livestock not weighed at the premises, correction to names for ponds and tank, and request to remove the improvement requirement to provide an updated NIMP.	Administrative amendments made to the licence, condition 3.3.1 and 5.2.1 updated to reflect estimated live weight of animals, updated names of tank and ponds. The improvement requirement remains as the risk posed by irrigation of treated water is moderate. The Licensee has a NIMP that was produced in 2007 that therefore requires updating to ensure it reflects current site activities and risks.

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

Operation

The main emission of concern from the DBC Abattoir is emissions to land via irrigation of treated wastewater. The premises has been reported under the requirements of the *Contaminated Sites Act 2003* as 'Possibly contaminated – investigation required' due to elevated nutrient levels detected in groundwater monitoring at the premises.

Emission Description

Emission: Wastewater seepage from the wastewater treatment ponds and direct discharge of wastewater through irrigation of 10.5 ha of paddocks.

Impact: Discharge of treated wastewater to surface water or groundwater. A wetland subject to the provisions of the *Environmental Protection (Swan Coastal Plain Lakes) Policy 1992* is located approximately 200 m W of the premises. The Ferguson River is located approximately 1 km S and the Leschenault inlet is located approximately 2.3 km N of the premises. The depth to groundwater at the premises ranges from 0 – 2 m.

Results from the quarterly ambient groundwater monitoring at the premises show potential elevated nutrient concentrations, particularly phosphorus and nitrogen, in all three bores located at the premises, which is likely attributed to historic contamination caused by seepage from the old pond system.

Controls: New treatment tanks and ponds were constructed in 2011 in response to an Environmental Protection Notice issued by the Department of Environment Regulation to replace the old pond system, which has since been removed. The treatment system comprises of an EEI High-Rate Anaerobic Reactor Technology (HART) tank, an Advanced Nutrient Removal Unit Process pond, and a Phosphorus Removal and Holding pond. The new ponds are HDPE lined with a leak detection system and high level alarms.

The total volume of treated wastewater irrigated to land is recorded and water quality is monitored quarterly. This allows nutrient loading rates to be calculated and compared against licence limits. Flow data has potentially not been accurately recorded due to old flow meters. New flow meters were installed in-line with the old meters in January and February 2015. The data from these recorded approximately 67% of the volume of the old meters. Therefore, loading rates of TP, TN and BOD to the irrigation area have potentially been overestimated in the past.

Wastewater application is controlled to avoid surface run-off and irrigation rotated across the available irrigation paddocks. The wastewater treatment system is monitored on CCTV and flow into the ponds from the anaerobic tank can be controlled remotely by an engineer. The irrigation system is fitted to a rain gauge that is calibrated to 2 mm at the main irrigation control station. If the 2 mm cup is filled with rainfall the irrigation will automatically stop and not restart until that 2 mm has evaporated; ensuring that no irrigation occurs if heavy rainfall is occurring or has occurred recently.

The new anaerobic tank and new wastewater treatment ponds installed during 2011 have continued to be optimised by DBC since installation to achieve lower levels of total nitrogen and total phosphorus in the treated wastewater irrigated to land. However, the most recent 2014 data showed that total phosphorus exceeded the current limits specified in the licence. The total phosphorous loading rate ranges from 25kg/ha/yr to 67kg/ha/yr (licence limit 20kg/ha/yr). The range and uncertainty in this value comes from the potential inaccuracy of the old flow meters and that the Licensee considered that the sampling result for March 2014 was an anomalous result at 28mg/l. The Licensee has previously provided a Nutrient and Irrigation Management Plan (NIMP), dated December 2007 to DER; however, the NIMP does not currently reflect practices that occur onsite



Risk Assessment

Consequence: Moderate

Likelihood: Possible

Risk Rating: Moderate

Regulatory Controls

Condition 1.3.2 imposes controls on the irrigation of treated wastewater to ensure that:

- wastewater is evenly distributed over the irrigation area;
- no soil erosion or ponding of wastewater occurs;
- there is no direct runoff, spray drift or discharge beyond the irrigation area;
- healthy vegetation cover is maintained over the irrigation area;
- irrigation shall not occur within fifty (50) metres of any defined watercourse or drain; and
- discharge does not occur during periods of rainfall or onto flooded area(s).

Condition 2.2.1 authorises the discharge of treated waste water to land. The current licence limits have been replicated in condition 2.2.2. The limits take into account the main soil type being leached sands and the fact that a wetland subject to the provisions of the *Environmental Protection (Swan Coastal Plain Lakes) Policy 1992* is located approximately 200 m W of the premises. The current NIMP produced in 2007 does not currently reflect practices that occur onsite. Given this and the data that shows the loading rate for total phosphorus in 2014 exceeded the limit specified in the licence, improvement requirement IR1 has been added to the licence through condition 4.1.1. This requires the Licensee to submit an updated NIMP to DER. The completion date for this requirement has been set at 31 March 2016 to allow the Licensee to collate the data from the 2015 reporting period and use it as part of the NIMP update.

Condition 3.2.1 has been included on the licence to ensure that the Licensee continues to monitor the quantity and quality of water irrigated to land on a quarterly basis.

Condition 3.4.1 has been included on the licence to continue to monitor ambient groundwater quality to detect whether the irrigation of treated wastewater to land is potentially impacting on the groundwater.

Residual Risk

Consequence: Moderate

Likelihood: Possible

Risk Rating: Moderate

References:

Water Quality Protection Note 33 Nutrient and Irrigation Management Plans, Department of Water (June 2010) – all sections.