



Works Approval Number: W6022/2017/1

Works Approval Holder: Yeeda Pastoral Company Pty Ltd
(ACN 094 819 717)

Registered business address: Unit 5, 186 Hampden Road
NEDLANDS WA 6009

Duration: 31/03/2017 to 31/03/2020

Prescribed Premises: Category 55: Livestock saleyard or holding pen

Premises: Kilty Station Yards
Part Lot 263 on Plan 194605
Dampier Location 263
WATERBANK WA 6725

This Works Approval is granted to the Works Approval Holder, subject to the following conditions, on 30/03/2017, by:

Date signed: 30 March 2017

Caron Goodbourn
A/Manager (Process Industries)

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

Explanatory Notes

These Explanatory Notes do not form part of this Works Approval.

Defined terms

Definition of terms used in this Works Approval can be found at the end of this Works Approval. Terms which are capitalised are defined terms.

Department of Environment Regulation

The Department is the agency responsible for administering Part V of the *Environmental Protection Act 1986* (WA) (EP Act) for the regulation of Prescribed Premises. The Department also monitors and audits compliance with licences, works approvals, takes enforcement action and develops and implements licensing and industry regulation policy.

Works Approval

Section 52 of the EP Act provides that an occupier of any premises commits an offence if any work is undertaken on or in relation to the premises which causes the premises to become or to become capable of being Prescribed Premises, except in accordance with a works approval.

Section 56 of the EP Act provides that an occupier of Prescribed Premises commits an offence if Emissions are caused or increased or permitted to be caused or increased, or Waste, noise, odour or electromagnetic radiation is altered or permitted to be altered from Prescribed Premises, except in accordance with a works approval or licence.

Categories of Prescribed Premises are defined in Schedule 1 of the *Environment Protection Regulations 1987* (WA).

This Works Approval does not authorise any activity which may be a breach of another approval by another authority. For example, if the Premises have been assessed under Part IV of the EP Act, the Works Approval Holder is still required to comply with any conditions imposed by the Minister for Environment under Part IV.

It is the responsibility of the Works Approval Holder to ensure that any action or activity referred to in this Works Approval is permitted by, and is carried out in compliance with, statutory requirements.

The Works Approval Holder must comply with the Works Approval. Contravening a Works Approval Condition is an offence under section 55 of the EP Act.

Responsibilities of Works Approval Holder

Separate to the requirements of this Works Approval, general obligations of Works Approval Holder are set out in the EP Act and the regulations made under the EP Act. For example, the Works Approval Holder must comply with the following provisions of the EP Act:

- the duties of an occupier under section 61; and
- 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 (section 53).

Strict penalties apply for offences under the EP Act.

Reporting of incidents

The Works Approval Holder has a duty to report to the Department all Discharges of Waste that have caused or are likely to cause Pollution, Material Environmental Harm or Serious Environmental Harm, in accordance with section 72 of the EP Act.

Offences and defences

The EP Act and its regulations set out a number of offences including:

- Offence of emitting an Unreasonable Emission from any Premises under section 49;
- Offence of causing Pollution under section 49;
- Offence of dumping Waste under section 49A;
- Offence of discharging Waste in circumstances likely to cause Pollution under section 50;
- Offence of causing Serious Environmental Harm (section 50A) or Material Environmental Harm (section 50B);
- Offence of causing Emissions which do not comply with prescribed standards (section 51);
- Offences relating to Emissions or Discharges under regulations prescribed under the EP Act, including materials discharged under the *Environmental Protection (Unauthorised Discharges) Regulations 2004 (WA)*;
- Offences relating to noise under the *Environmental Protection (Noise) Regulations 1997 (WA)*.

Defences to certain offences may be available to a Works Approval Holder and these are set out in the EP Act.

Section 74A(b)(iii) provides that it is a defence to an offence for causing Pollution, in respect of an Emission, or for causing Serious Environmental Harm or Material Environmental Harm, or for discharging or abandoning Waste in water to which the public has access, if the Works Approval Holder can prove that an Emission or Discharge occurred in accordance with a Works Approval.

This Works Approval specifies the Emissions and Discharges, and the limits and Conditions which must be satisfied in respect of Specified Emissions and Discharges, in order for the defence to offence provision to be available.

Authorised Emissions and Discharges

Section 56 of the EP Act provides that the occupier of any Prescribed Premises who -

- (a) causes or increases, or permits to be caused or increased, an Emission; or
- (b) alters or permits to be altered the nature of the Waste, noise, odour, or electromagnetic radiation emitted,

from the Prescribed Premises commits an offence unless he is the holder of a Licence issued in respect of the Prescribed Premises and so causes increases or permits or alters in accordance with any Condition to which that Licence is subject. This does not apply if the Emission is caused, increased or altered as a result of anything done in accordance with a Works Approval and while the Works Approval is in force.

The Specified and General Emissions and Discharges from the Works authorised through this Works Approval are authorised to be conducted in accordance with the Conditions of this Works Approval.

Amendment of Works Approval

Section 53 of the EP Act provides that a Works Approval Holder commits an offence if Emissions are caused, or altered from a Prescribed Premises unless done in accordance with a Works Approval.

The Works Approval Holder can apply to amend the Conditions of this Works Approval

under section 59 of the EP Act. An application form for this purpose is available from the Department.

The CEO may also amend the Conditions of this Works Approval at any time on the initiative of the CEO without an application being made.

[Duration of Works Approval](#)

The Works Approval will remain in force for the duration set out on the first page of this Works Approval or until it is surrendered, suspended or revoked in accordance with section 59A of the EP Act.

[Suspension or Revocation](#)

The CEO may suspend or revoke this Works Approval in accordance with s59A of the EP Act.

Conditions

Infrastructure and Equipment

1. The Works Approval Holder must install and undertake the Works for the infrastructure and equipment:
 - (a) specified in Column 1;
 - (b) to the requirements specified in Column 2; and
 - (c) at the location specified in Column 3
 of Table 1 below.
2. The Works Approval Holder must not depart from the requirements specified in Column 2 of Table 1 except:
 - (a) where such departure does not increase risks to public health, public amenity or the environment; and
 - (b) all other Conditions in this Works Approval are still satisfied.
3. Subject to Condition 2, within 30 days of the completion of the Works specified in Column 1 of Table 1, the Works Approval Holder must provide to the CEO a report, including photographs, confirming each item of infrastructure or component of infrastructure specified in Column 1 of Table 1 below has been constructed with no material defects and to the requirements specified in Column 2 of Table 1.
4. Where a departure from the requirements specified in Column 2 of Table 1 occurs and is of a type allowed by Condition 2, the Works Approval Holder must provide to the CEO a description of, and explanation for the departure along with the certification required by Condition 2(b).

Table 1: Infrastructure and Equipment Requirements Table

Column 1	Column 2	Column 3
Infrastructure / Equipment	Requirements (design and construction)	Site plan reference
Livestock holding pens	<ul style="list-style-type: none"> • Constructed of five rail galvanized cattle rail tubing with galvanized posts in concrete footings and will comprise a six pen configuration within an area 60m by 50m; • 2 x certified organic holding yards; • yards will be partially shaded and will be constructed of compacted soil base; • Capacity to hold up to 400 cattle at any one time; • Includes associated infrastructure: <ul style="list-style-type: none"> ▪ Animal crush (strongly built stall or cage for holding cattle); ▪ associated loading / unloading infrastructure; ▪ catchment drain along eastern perimeter of stockyards that flows into the premises wastewater pond. 	Proposed yards and race – 3x2 as shown in Schedule 1 Premises Plan

Column 1	Column 2	Column 3
Infrastructure / Equipment	Requirements (design and construction)	Site plan reference
Wastewater (contaminated stormwater) evaporation pond	<ul style="list-style-type: none"> Stormwater flows to pond via an eastern perimeter catchment drain; minimum storage capacity of 1,000m³; lined with clay or similar impervious material; 400mm perimeter bund (above ground level) around the top of the pond embankments to mitigate stormwater ingress; operated to maintain a 500mm Freeboard. 	Wastewater pond as shown in Schedule 1 Premises Plan
Animal dip	<ul style="list-style-type: none"> To be constructed of 6mm mild steel with joins and seams welded on both sides; To be constructed such that the dip is impervious and allows no dip chemicals to discharge to the surrounding environment; and Is roofed and designed such that splash barriers and drainage infrastructure prevents any discharges of the dip chemicals to the environment. 	Animal dip (new dip) as shown in Schedule 1 Premises Plan
Animal carcass pit	<ul style="list-style-type: none"> Located in northwest corner of premises; Animal carcass trench to be located at least 70m away from watercourses, 50m away from nearest property; and a separation distance of at least 3m is maintained between groundwater table level and bottom of the trench. 	Located in northwest corner of Schedule 1 Premises Map

Emissions

5. The Works Approval Holder must not cause any Emissions from the Works authorised through this Works Approval except for General Emissions described in Column 1, subject to the exclusions, limitations or requirements specified in Column 2, of Table 2.

If the Works Approval Holder proves that it has acted in accordance with this Condition, it may be a defence under s 74A of the EP Act to proceedings for offences under the EP Act.

Table 2: Authorised Emissions Table

Column 1	Column 2
Emission Type	Exclusions/Limitations/Requirements
General Emissions	
Emissions which arise from undertaking the Works set out in the General Description in Schedule 2.	Emissions excluded from General Emissions are: <ul style="list-style-type: none"> Unreasonable Emissions; or Emissions that result in, or are likely to result in, Pollution, Material Environmental Harm or Serious Environmental Harm; or Discharges of Waste in circumstances likely to cause Pollution; or Emissions that result, or are likely to result in, the Discharge or abandonment

Column 1	Column 2
Emission Type	Exclusions/Limitations/Requirements
	<p>of Waste in water to which the public has access; or</p> <ul style="list-style-type: none"> • Emissions or Discharges which do not comply with an Approved Policy; or • Emissions or Discharges which do not comply with prescribed standard; or • Emissions or Discharges which do not comply with the conditions in an Implementation Agreement or Decision; or • Emissions or Discharges the subject of offences under regulations prescribed under the EP Act, including materials discharged under the <i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i>.

Information

6. The Works Approval Holder must maintain accurate Books including information, reports and data in relation to the Works and the Books must:
 - (a) be legible;
 - (b) if amended, be amended in such a ways that the original and subsequent amendments remain legible or are capable of retrieval;
 - (c) be retained for at least 3 years from the date the Books were made;
 - (d) be available to be produced to an Inspector or the CEO.
7. The Works Approval Holder must comply with a Department Request within 14 days from the date of the Department Request or such other period as agreed to by the Inspector or the CEO.

Definitions and Interpretation

Definitions

In this Works Approval, the following terms have the following meanings:

Books has the same meaning given to that term under the EP Act.

CEO for the purposes of notification means:

Director General
Department Administering the *Environmental Protection Act 1986*
Locked Bag 33 Cloisters Square
PERTH WA 6850
info@der.wa.gov.au

Condition means a condition to which this Works Approval is subject under s 62 of the EP Act.

Department means the department established under section 35 of the *Public Sector Management Act 1994* and designated as responsible for the administration of Part V, Division 3 of the EP Act.

Department Request means a request for Books or other sources of information to be produced, made by an Inspector or the CEO to the Works Approval Holder in writing and sent to the Works Approval Holder's address for notifications, as described at the front of this Works Approval, in relation to:

- (a) compliance with the EP Act or this Works Approval;
- (b) the Books or other sources of information maintained in accordance with this Works Approval; or
- (c) the Books or other sources of information relating to Emissions from the Premises.

Discharge has the same meaning given to that term under the EP Act.

Emission has the same meaning given to that term under the EP Act.

Environmental Harm has the same meaning given to that term under the EP Act.

EP Act means the *Environmental Protection Act 1986 (WA)*.

EP Regulations means the *Environmental Protection Regulations 1987 (WA)*.

Freeboard means the distance between the maximum water surface elevations and the top of the retaining banks or structures at its lowest point.

General Description means the description of activities and operations carried out on the Premises as set out in Schedule 2 of this Works Approval.

Implementation Agreement or Decision has the same meaning given to that term under the EP Act.

Inspector means an inspector appointed by the CEO in accordance with section 88 of the EP Act.

Material Environmental Harm has the same meaning given to that term under the EP Act.

Pollution has the same meaning given to that term under the EP Act.

Premises refers to the premises to which this Works Approval applies, as specified at the front of this Works Approval and as shown on the map in Schedule 1 to this Works Approval.

Prescribed Premises has the same meaning given to that term under the EP Act.

Reportable Event means an exceedance above the target limit specified in Column 4 of Table 5.

Serious Environmental Harm has the same meaning given to that term under the EP Act.

Unreasonable Emission has the same meaning given to that term under the EP Act.

Waste has the same meaning given to that term under the EP Act.

Works Approval refers to this document, which evidences the grant of the works approval by the CEO under s 54 of the EP Act, subject to the Conditions.

Works Approval Holder refers to the occupier of the Premises being the person to whom this Works Approval has been granted, as specified at the front of this Works Approval.

Works means the Works listed in Schedule 2 of this Works Approval to be carried out at the Premises, subject to the Conditions.

Interpretation

In this Works Approval:

- (a) the words 'including', 'includes' and 'include' will be read as if followed by the words 'without limitation';
- (b) where any word or phrase is given a defined meaning, any other part of speech or other grammatical form of that word or phrase has a corresponding meaning;
- (c) where tables are used in a Condition, each row in a table constitutes a separate Condition; and
- (d) any reference to an Australian or other standard, guideline or code of practice in this Works Approval means the version of the standard, guideline or code of practice in force at the time of granting of this Works Approval and includes any amendments to the standard, guideline or code of practice which may occur from time to time during the course of the Works Approval.

Schedule 1: Maps

Premises Map

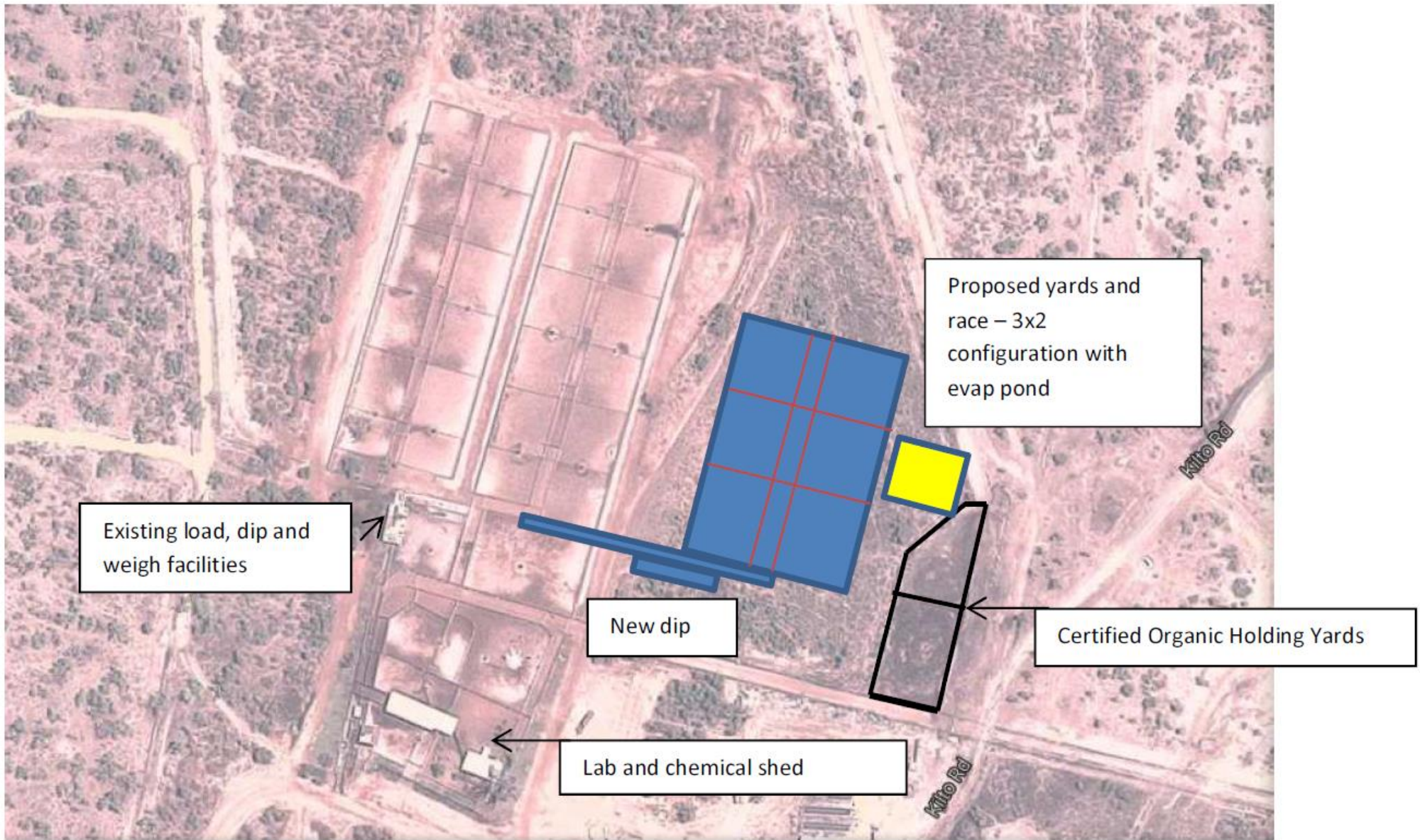
The Premises is shown in the map below. The yellow line depicts the boundary to the Premises. GPS points of each vector of the Premises boundary are shown in the table below.



GPS Point	Vector	Coordinates
1	North West	-17.681520, 122.711513
2	North East	-17.681459, 122.713812
3	South West	-17.688824, 122.712523
4	East	-17.689006, 122.715682
5	South East	-17.689743, 122.715575

Premises Plan

The Premises Plan is shown in the map below.



Schedule 2: General Description

At the time of assessment, Emissions and Discharges from the Works listed in Table 3 were considered in the determination of the risk and related Conditions for the Works Approval.

Table 3: Authorised Works

Item	Works	Specifications/Drawings
1	Livestock holding pens	<ul style="list-style-type: none"> Constructed of five rail galvanized cattle rail tubing with galvanized posts in concrete footings and will comprise a six pen configuration within an area 60m by 50m; 2 x certified organic holding yards; The yards will be partially shaded and will be constructed of compacted soil base; Capacity to hold up to 400 cattle at any one time; Includes associated infrastructure: <ul style="list-style-type: none"> Animal crush (strongly built stall or cage for holding cattle); associated loading / unloading infrastructure; catchment drain along eastern perimeter of stockyards that flows into the premises wastewater pond.
2	Wastewater (contaminated stormwater) evaporation pond	<ul style="list-style-type: none"> Stormwater flows to pond via an eastern perimeter catchment drain; minimum storage capacity of 1,000m³; lined with clay or similar impervious material; 400mm perimeter bund (above ground level) around the top of the pond embankments to mitigate stormwater ingress; operated to maintain a 500mm Freeboard.
3	Animal dip	<ul style="list-style-type: none"> To be constructed of 6mm mild steel with joins and seams welded on both sides; To be constructed such that the dip is impervious and allows no dip chemicals to discharge to the surrounding environment; and Is roofed and designed such that splash barriers and drainage infrastructure prevents any discharges of the dip chemicals to the environment.
4	Animal carcass pit	<ul style="list-style-type: none"> Located in northwest corner of premises; Animal carcass trench to be located at least 70m away from watercourses, 50m away from nearest property; and a separation distance of at least 3m is maintained between groundwater table level and bottom of the trench.



Application for Works Approval

Division 3, Part V *Environmental Protection Act 1986*

Applicant: Yeeda Pastoral Company Pty Ltd

ACN: 094 819 717

Works Approval: W6022/2017/1

File Number: DER2016/002487

Premises: Kildo Station Yards
Part Lot 263 on Plan 194605
Dampier Location 263
WATERBANK WA 6725

Date of report: 30/03/2017

Status of Report **FINAL**

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Appendix 1: Key Documents

Appendix 2: Summary of Applicant's Comments on Risk Assessment and Draft Conditions

Definitions of terms and acronyms

Term	Definition
AACR	Annual Audit Compliance Report
AER	Annual Environment Report
Applicant	Yeeda Pastoral Company Pty Ltd
Category/Categories (Cat.)	categories of prescribed premises as set out in Schedule 1 of the EP Regulations
DER	Department of Environment Regulation
Decision Report	this document
Delegated Officer	An officer under section 20 of the EP Act.
EP Act	<i>Environmental Protection Act 1986 (WA)</i>
EP Regulations	<i>Environmental Protection Regulations 1987 (WA)</i>
Freeboard	Freeboard means the distance between the maximum water surface elevations and the top of the retaining banks or structures at its lowest point
m ³	cubic metres
Premises	Kilto Station Yards
Prescribed Premises	Premises prescribed under Schedule 1 to the EP Regulations
prescribed premises	premises prescribed under Schedule 1 to the EP Regulations.

1. Purpose and scope of assessment

DER received an application from Yeeda Pastoral Company Pty Ltd (the Applicant) for a works approval to construct a livestock saleyard or holding pen on Kilty Station (the premises) within the Shire of Brome. This Decision Report assesses emissions and discharges from construction and operation of the proposed livestock saleyard or holding pen, which triggers a prescribed premises category in accordance with Schedule 1 Part 1 of the EP Regulations, as outlined in Table 1 below.

Table 1: Prescribed Premises Categories

Classification of Premises	Description	Approved premises throughput
55	Livestock saleyard or holding pen: premises on which live animals are held pending their sale, shipment or slaughter	44,000 animals per year

2. Background

The applicant operates Kilty Station, a 30,000ha pastoral station under a Crown lease granted by the Department of Lands (DoL) for the purpose of pastoral activities including the breeding, raising and sale of cattle. The applicant also holds a sub-lease with the DoL which permits the irrigation of 500ha of land on Kilty Station, which is used for the purposes of growing fodder crops (such as sorghum and Rhodes grass) as a source of quality cattle feed all year round.

Kilty Station has an existing livestock holding pen, which has operated since 2008 at thresholds below the requirement for licensing under the EP Act. As a result of growth in the cattle herd owned by the applicant, at Kilty and across other stations held by Yeeda Pastoral Company Pty Ltd, in addition to the recent commencement of operations at the nearby Colourstone Abattoir, the applicant is seeking to expand the size of the existing cattle holding yards at the premises, which will result in the design capacity exceeding the threshold for a category 55 prescribed activity. The primary purpose of the premises is to aggregate cattle brought in from surrounding stations for drafting, watering and feeding pending their sale, shipment or slaughter. Cattle are predominantly fed hay with some pellets. Feed is delivered manually (off the back of a vehicle) to rows of feed troughs located along the inside perimeter of the yards.

The Kilty Station yards will not operate during the wet season (typically December to March in each year), therefore, it is anticipated the premises will only operate for around 40 weeks of the year, during the months from April to November.

3. Overview of Kilty Station Yards

3.1 Infrastructure

The Kilty Station Yards infrastructure, as it relates to Category 55 activities, is detailed in Table 2 and with reference to the Premises Plan (attached in the works approval). Table 2 has been broken down to include proposed infrastructure to be constructed under this works approval, as well as existing infrastructure already constructed. The applicant will be required to apply for an operating licence for all category 55 infrastructure on the premises once the new yards have been constructed.

Table 2: Kילו Station Yards Category 55 infrastructure

Prescribed Activity Category 55	
Proposed Infrastructure	
1	New Livestock holding pens and associated loading / unloading infrastructure and animal crush (strongly built stall or cage for holding cattle). Holding pens to have capacity to hold up to 400 cattle at any one time (~20,000 animals per year)
2	New Animal dip (impervious dipping pit which cattle pass through to be chemically treated for pests)
3	New Clay-lined wastewater (contaminated stormwater) evaporation pond
Existing Infrastructure (not previously prescribed premises but combined with proposed infrastructure will form part of the prescribed premises)	
4	Livestock holding pens (24 pens) and associated loading / unloading infrastructure. Holding pens with existing capacity to hold up to 600 cattle at any one time (~24,000 animals per year)
5	Animal dip (impervious dipping pit which cattle pass through to be chemically treated for pests)
6	Animal carcass pit (approximately 4m deep)

The new yards will be constructed of five rail galvanized cattle rail tubing with galvanized posts in concrete footings and will comprise a six pen configuration within an area 60m by 50m. The yards will be partially shaded and will be constructed of compacted soil base. A drain will run along the eastern perimeter of the new yards to collect potentially contaminated stormwater runoff that will report to a wastewater evaporation pond, also east of the yards. The wastewater evaporation pond will be clay lined with dimensions 25m x 20m x 2m deep, giving a capacity of 1,000m³. The pond will be constructed with a 400mm earthen bund around the embankments to prevent stormwater inflows and will be operated to maintain a 500mm Freeboard.

Additional infrastructure to be built includes loading/unloading races, a cattle crush and cattle dip (containing parasiticide chemical). The cattle dip will be constructed of 6mm mild steel with joints and seams welded from both sides, finished in a powder coated 2 pack epoxy treatment of 500 microns thickness. The dip will be below ground with flashing rising from the top of the dip to a height of 2m to prevent any splashing of chemical from discharging to the environment, or any inflows of stormwater, and will be roofed. Drain pans will be in place at the exit of the dip to allow any liquid chemical to run back into the dip as cattle exit the dip. The dip dimensions will be 10.5m long by 1.2m wide by 2.1m deep, with a 3.5m swim.

3.2 Operational aspects

Cattle are brought in to the yards at Kילו Station throughout the year when they are ready for export or slaughtering. Cattle are transported in road trains from a number of pastoral stations around the Kimberley and are offloaded via one of the unloading ramps that lead into the livestock yards for watering, feeding, dipping and sorting as required. Cattle are usually held for a few days to a week prior to being transported to an abattoir for processing or live export via the Port of Broome.

Manure generated by animals in the yards is collected regularly and immediately removed from the premises to be used as fertilizer / soil conditioner on Kildo Station irrigation area, 1.5km southeast of the livestock yards. Manure is not transported on any public road.

Deceased cattle are disposed of to the premises animal carcass pit located around 500m north-northwest of the yards. During the recent operating season, approximately one animal fatality per week was experienced; meaning around 40 cattle per year will be disposed of to the animal carcass pit. Carcasses are immediately buried to a depth of 4m following disposal to the pit.

4. Legislative context

4.1 Other relevant approvals

4.1.1 Planning approvals

The Shire of Broome (the Shire) was consulted on 8 February 2017 to determine if planning approvals are required for the proposal to construct additional livestock holding yards at Kildo Station and to seek comment on the proposal. A response from the Shire was received on 1 March 2017 indicating that planning approval under the Shire's Local Planning Scheme is not required. The Shire advised that, subject to appropriate management measures being put in place to avoid potential nutrient run-off, the Shire has no objections to the issuing of a works approval for the proposal.

4.2 Part V of the EP Act

4.2.1 Guidance Statements

The overarching legislative framework of this assessment is the EP Act and EP Regulations. DER Guidance Statements which inform this assessment are:

- *Guidance Statement: Regulatory Principles (July 2015)*
- *Guidance Statement: Setting Conditions (October 2015)*
- *Guidance Statement: Land Use Planning (October 2015)*
- *Guidance Statement: Licence Duration (November 2015)*
- *Guidance Statement: Publication of Annual Audit Compliance Reports (May 2016)*
- *Guidance Statement: Decision Making (November 2016)*
- *Guidance Statement: Risk Assessment (November 2016)*
- *Guidance Statement: Environmental Siting (November 2016)*

5. Consultation

In addition to consultation with the Shire of Broome as outlined in section 4.1.1, DER also sought comment from the Department of Agriculture and Food, Western Australia (DAFWA) on 8 February 2017. Comments received from DAFWA related to the potential for surface runoff to occur during wet conditions. DAFWA recommended animal manure and feed residue be stockpiled in a location of low flood risk.

6. Location and siting

6.1 Siting context

Kilto Station is located approximately 60km northeast of Broome along the Great Northern Highway. Surrounding properties include other pastoral stations, an Aboriginal community and the Colourstone Abattoir located 48km east.

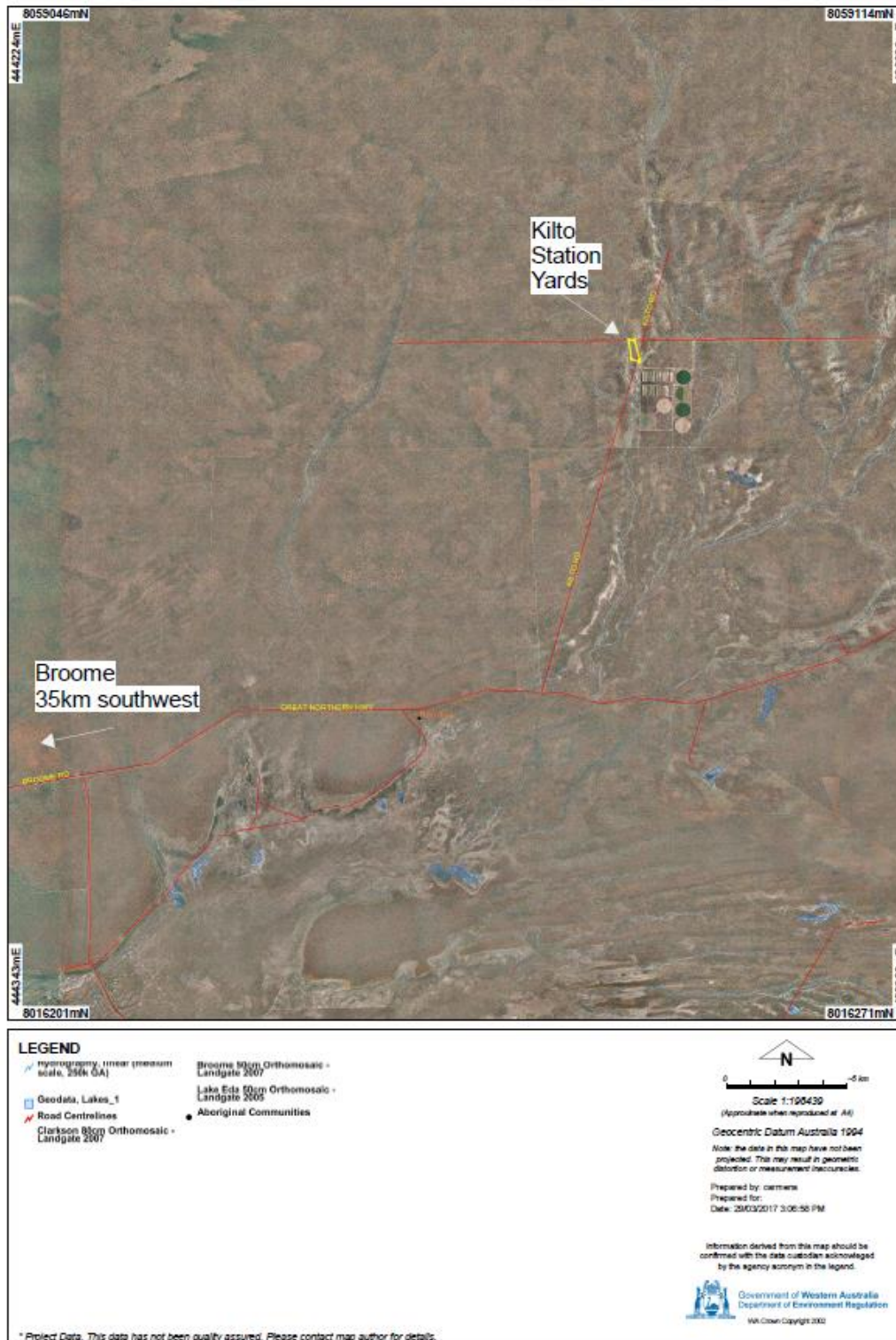


Figure 1: Location map – Kilto Station Yards

6.2 Residential and sensitive premises

All identified residential and sensitive receptors are sufficiently distanced from the Premises. The distances to residential and sensitive receptors are as follows:

Table 3: Receptors and distance from activity boundary

Sensitive Land Uses	Distance from Prescribed Activity
Residential Premises – Aboriginal Community of Rarrdjali (two dwellings)	17km south-southwest of premises boundary
Township of Broome	60km southwest of premises boundary

6.3 Specified ecosystems

Specified ecosystems are defined in the DER Guidance Statement *Environmental Siting* (November 2016). The distances to specified ecosystems are shown in Table 4.

Table 4: Specified ecosystems

Specified ecosystems	Distance from the Premises
ANCA Wetland: lake subject to inundation, part of the Roebuck Plains System	5.9km southeast of the premises boundary
Threatened Ecological Community: related to the Roebuck Plains Wetland system	12.6km southeast, 15.5km south and 16.4km south-southwest of the premises boundary
Other relevant ecosystem values	Distance from the Premises
Perennial watercourse (medium scale creek)	70m east of premises boundary

6.4 Groundwater and water sources

The distances to groundwater and water sources are shown in Table 5.

Table 5: Groundwater and water sources

Groundwater and water sources	Distance from Premises	Environmental Value
Broome Water Reserve	22km west of the premises boundary	Priority 1 Public Drinking Water Source Area
Groundwater below the premises is proclaimed under the <i>Rights in Water and Irrigation Act 1914</i> . Canning-Kimberley Groundwater Area.	The applicant has advised that groundwater is located approximately 14m below ground level (wet season measurement taken March 2017).	Groundwater is used for potable purposes (there is a bore at the Kילו Station Homestead located 500m south) as well as for monitoring and irrigation purposes

6.5 Other site characteristics

The locations of other receptors are shown in Table 6.

Table 6: Other landscape features, relevant factors or receptors

Other receptors or areas of concern	Location
Broad scale cropping and irrigation practices on Kילו Station	410m south east of premises boundary

6.6 Soil type

DER's mapping system, GIS Viewer, utilises the digital dataset 'Atlas of Australian Soils' (Northcote et al 1960-1968) to give data summaries of soils types across Australia. Soils in the area of the Kilty Station Yards are described as sand plain with longitudinal sand dunes and some active drainage-ways: chief soils are red earthy sands (Uc5.21) associated with (Uc5.22) and (Uc5.1 l) soils on the plains, with dunes and hummocks of red sands (Uc1.23). Some (Gn2.21) and (Dy5.32) soils occur in lower sites often with a heavy surface layer of ferruginous gravel.

6.7 Meteorology

6.7.1 Wind direction and strength

The closest Bureau of Meteorology weather station to Kilty Station is the Broome Aero Station, located 60km southwest of the premises. Average annual wind direction in Broome blows from the west for around 45% of the year (predominantly in the afternoons), from the east for around 25% of the year, and from the southeast for around 20% of the year (predominantly in the mornings, and during the dry season). Wind speeds of up to 30km per hour can be experienced throughout the year.

6.7.2 Regional climatic aspects

Broome (and surrounding areas, including Kilty Station) has a semi-arid climate. Like most parts of the Australian tropics, it has two seasons: a dry season and a wet season. Broome is susceptible to tropical cyclones and these, along with the equally unpredictable nature of summer thunderstorms, play a large part in the erratic nature of the rainfall received in the area. A high average daily evaporation rate of around 7.6mm per cubic metre (annual average) is experienced in the Broome region

6.7.3 Rainfall and temperature

The dry season is from April to November with nearly every day clear and maximum temperatures around 30 °C. The wet season extends from December to March, with maximum temperatures of around 35 °C, rather erratic tropical downpours and high humidity. Broome's annual rainfall average is 611 mm, 75% of which falls from January to March. Figure 1 shows mean rainfall and temperature recordings for Broome.

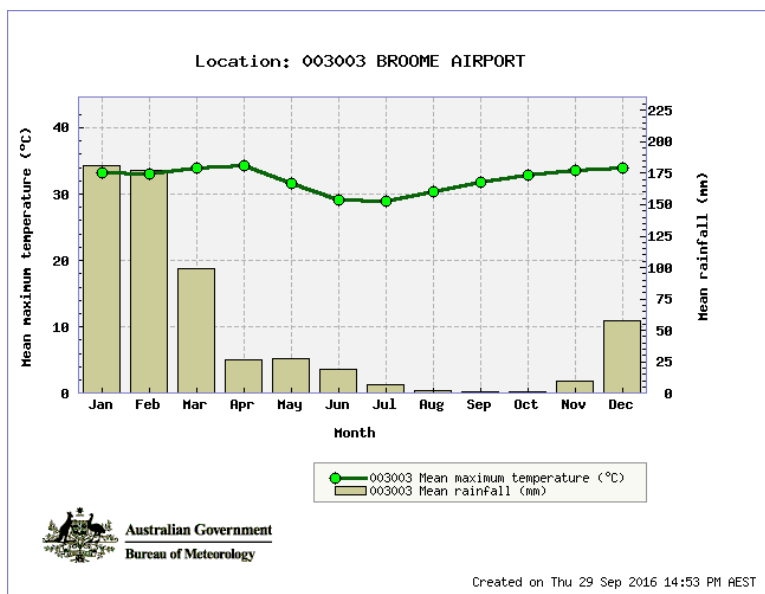


Figure 2: Mean maximum temperature and mean rainfall for Broome Airport

7. Risk assessment

7.1 Confirmation of potential impacts

Identification of key potential emissions, pathways, receptors and confirmation of potential impacts are set out in Tables 7 and 8 below. Tables 7 and 8 also identify which potential emissions will be progressed to a full risk assessment. Some potential emissions/impacts may not receive a full risk assessment where a potential receptor or pathway cannot be identified or where the emission/impacts are regulated under a Ministerial Statement.

Table 7: Identification of key emissions during construction

			Potential Emissions	Potential Receptors	Potential Pathway	Potential Impacts	Continued to detailed risk assessment?	Reasoning
Source (see Section 8 for infrastructure references)	Construction, mobilisation and positioning of infrastructure	Vehicle movements on unsealed access roads during construction period	Noise	No residences or other sensitive receptors in proximity	Air / wind dispersion	None	No	No receptor present. Closest residence (Rarrdjali) is 17km south-southwest of premises boundary
			Dust			None	No	No receptor present
		Construction of new cattleyards, dip and wastewater evaporation pond (earthworks)	Noise			None	No	No receptor present
			Dust			None	No	No receptor present

Table 8: Identification of key emissions during operation

			Potential Emissions	Potential Receptors	Potential Pathway	Potential Impacts	Continued to detailed risk assessment?	Reasoning
Source (see Section 8 for infrastructure references)	Operation of stockyards (category 55 operations)	Holding and loading / unloading of cattle).	Odour	No residences or other sensitive receptors in proximity	Air / wind dispersion	Public health impacts and amenity	No	No receptor present. Closest residence (Rarrdjali) is 17km south-southwest of premises boundary.
			Noise					
			Dust					
		Solid and liquid (Leachate / sediment / contaminated stormwater) (from wastes such as manure)	<p>Perennial watercourse (medium scale creek) 70m from premises boundary</p> <p>ANCA Wetland: lake subject to inundation, part of the Roebuck Plains System 5.9km southeast of premises boundary</p> <p>Depth to groundwater is approximately 14mbgl</p> <p>Soils comprise sand plains and dune fields</p>	<p>Direct infiltration into soils.</p> <p>Direct overland flows to surface water.</p> <p>Infiltration down through soils to groundwater</p>	Ecosystem health: potential contamination of soils, surface water and groundwater from nutrient-rich leachate	Yes	The operation of Kילו Station Yards occurs from April to December in each year. During the operating season, approximately 44,000 cattle will pass through the stockyards, producing around 4,000 tonnes of manure per year, which will be removed from the pens and spread as fertiliser at Kילו Station Irrigation Area. The generation of solid waste, sediment and leachate as a result of these operations has the potential to impact the surrounding environment if not managed appropriately. See section 7.4 for detailed risk assessment.	

			Potential Emissions	Potential Receptors	Potential Pathway	Potential Impacts	Continued to detailed risk assessment?	Reasoning
		Dipping of cattle in the chemical dip	Spills and overflows from the chemical dip.	<p>Perennial watercourse (medium scale creek) 70m from premises boundary</p> <p>ANCA Wetland: lake subject to inundation, part of the Roebuck Plains System 5.9km southeast of premises boundary</p> <p>Depth to groundwater is approximately 14mbgl</p> <p>Soils comprise sand plains and dune fields</p>	<p>Direct infiltration into soils.</p> <p>Infiltration down through soils to groundwater.</p>	Ecosystem health: potential contamination of soils, surface water and groundwater with chemicals from the dip and storage infrastructure.	No	<p>On arrival at the yards, cattle are dipped in a chemical treatment solution to remove ticks.</p> <p>The dip will be constructed from 6mm powder coated steel, welded on both sides of joins. The dip will be below ground with flashing rising from the top of the dip to a height of 2m to prevent any splashing of chemical from discharging to the environment, or any inflows of stormwater, and will be roofed. Drain pans will allow any chemical to run back into the dip from the exit. Animal dip chemicals will be stored in dry form in a chemical storage shed in sealed containers</p> <p>The Delegated Officer considers that these controls are sufficient to reduce the risk of any emissions from the dip to the environment.</p>
	Operation of stockyards (category 55 operations)	Disposal of animal carcasses	Odour	No residences or other sensitive receptors in proximity	Air / wind dispersion	Odour has the potential to impact amenity and wellbeing.	No	<p>No receptor present. Closest residence (Rarrdjali) is 17km south-southwest of premises boundary.</p> <p>The Delegated Officer considers that Applicant controls (prompt burial and progressive capping / rehabilitation of the burial pit) are adequate to control odour emissions from decomposing carcasses.</p>

			Potential Emissions	Potential Receptors	Potential Pathway	Potential Impacts	Continued to detailed risk assessment?	Reasoning
			Leachate from decomposing carcasses	<p>Perennial watercourse (medium scale creek) 70m from premises boundary</p> <p>ANCA Wetland: lake subject to inundation, part of the Roebuck Plains System 5.9km southeast of premises boundary</p> <p>Depth to groundwater is approximately 14mbgl</p> <p>Soils comprise sand plains and dune fields</p>	Direct infiltration down through soils to groundwater	Ecosystem health: potential contamination of soils, surface water and groundwater	No	<p>The maximum depth of the carcass disposal pit is 4mbgl. Depth to groundwater is 14mbgl. Applicant controls include immediate burial and progressive capping / rehabilitation of the burial pit.</p> <p>The Delegated Officer considers that there is an adequate separation distance to groundwater. This, combined with Applicant controls, is adequate to manage the risk of leachate from the carcass disposal pit.</p>

7.2 Risk Criteria

During the assessment the risk criteria in Table 9 below will be applied to determine a risk rating set out in this section 7.

Table 9: Risk Criteria

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

Likelihood		Consequence		
The following criteria has been used to determine the likelihood of the risk / opportunity occurring.		The following criteria has been used to determine the consequences of a risk occurring:		
		Environment	Public Health* and Amenity (such as air and water quality, noise, and odour)	
Almost Certain	The risk event is expected to occur in most circumstances	Severe	<ul style="list-style-type: none"> on-site impacts: catastrophic off-site impacts local scale: high level or above off-site impacts wider scale: mid level or above Mid to long term or permanent impact to an area of high conservation value or special significance^ Specific Consequence Criteria (for environment) are significantly exceeded 	<ul style="list-style-type: none"> Loss of life Adverse health effects: high level or ongoing medical treatment Specific Consequence Criteria (for public health) are significantly exceeded Local scale impacts: permanent loss of amenity
Likely	The risk event will probably occur in most circumstances	Major	<ul style="list-style-type: none"> on-site impacts: high level off-site impacts local scale: mid level off-site impacts wider scale: low level Short term impact to an area of high conservation value or special significance^ Specific Consequence Criteria (for environment) are exceeded 	<ul style="list-style-type: none"> Adverse health effects: mid level or frequent medical treatment Specific Consequence Criteria (for public health) are exceeded Local scale impacts: high level impact to amenity
Possible	The risk event could occur at some time	Moderate	<ul style="list-style-type: none"> on-site impacts: mid level off-site impacts local scale: low level off-site impacts wider scale: minimal Specific Consequence Criteria (for environment) are at risk of not being met 	<ul style="list-style-type: none"> Adverse health effects: low level or occasional medical treatment Specific Consequence Criteria (for public health) are at risk of not being met Local scale impacts: mid level impact to amenity
Unlikely	The risk event will probably not occur in most circumstances	Minor	<ul style="list-style-type: none"> on-site impacts: low level off-site impacts local scale: minimal off-site impacts wider scale: not detectable Specific Consequence Criteria (for environment) likely to be met 	<ul style="list-style-type: none"> Specific Consequence Criteria (for public health) are likely to be met Local scale impacts: low level impact to amenity
Rare	The risk event may only occur in exceptional circumstances	Slight	<ul style="list-style-type: none"> on-site impact: minimal Specific Consequence Criteria (for environment) met 	<ul style="list-style-type: none"> Local scale: minimal to amenity Specific Consequence Criteria (for public health) met

^ Determination of areas of high conservation value or special significance should be informed by the *Guidance Statement: Environmental Siting*.

* In applying public health criteria, DER may have regard to the Department of Health's, *Health Risk Assessment (Scoping) Guidelines* "on-site" means within the prescribed premises boundary.

7.3 Risk Treatment

DER will treat risks in accordance with the Risk Treatment Matrix in Table 10 below:

Table 10: Risk Treatment

Rating of Risk Event	Acceptability	Treatment
Extreme	Unacceptable.	Risk event will not be tolerated. DER may refuse application.
High	Acceptable subject to multiple regulatory controls.	Risk event will be tolerated and may be subject to multiple regulatory controls. This may include both outcome-based and management conditions.
Medium	Acceptable, generally subject to regulatory controls.	Risk event is tolerable and is likely to be subject to some regulatory controls. A preference for outcome-based conditions where practical and appropriate will be applied.
Low	Acceptable, generally not controlled	Risk event is acceptable and will generally not be subject to regulatory controls.

7.4 Risk Assessment - Leachate and Contaminated Stormwater

7.4.1 General hazard characterisation and impact

Operation

There is the potential for impacts to surrounding soils, surface water, and groundwater should stormwater become contaminated from activities on the premises. Nutrients in cow manure (such as nitrogen and phosphorus) are highly soluble in water. Any stormwater falling on the holding pens will become contaminated with nutrients, and if not contained could impacts soils and the adjacent medium scale creek located 70m east of the premises boundary.

The annual operating period the Premises occurs from April to December in each year (during the dry season) which minimises potential for generation of contaminated stormwater, provided the cattleyards are sufficiently cleaned of manure during and at the end of each season. The premises is not located in an area subject to flooding or inundation. However, approximately 20% of the average annual rainfall occurs during the operating season (around 150mm of rain). This has the potential to impact on the adjacent environmental receptors if not adequately controlled.

7.4.2 Criteria for assessment

The *Australian Drinking Water Guidelines* (2011) apply to groundwater used for potable purposes. The *Australian Water Quality Guidelines for Fresh and Marine Water Quality 2000* (ANZECC & ARMCANZ 2000) provide freshwater and marine water trigger values at various levels of species protection. These guidelines apply to livestock drinking water as well as

long-term and short term irrigation water, for commercial and agricultural applications.

7.4.3 Applicant controls

The applicant is proposing to manage stormwater by constructing a drain on the eastern boundary of the holding yards that leads to a clay lined wastewater storage / evaporation pond with a capacity of 1,000m³. Stormwater flows from east to west across the yards, in line with the general gradient of the land. Incident rainfall falling on the yards will therefore flow to the eastern drain and report to the wastewater evaporation pond.

Table 11 outlines the Applicant controls that will be implemented to minimise the potential for generation of contaminated stormwater.

Table 11: Proposed Applicant controls to minimise infiltration to groundwater and discharge to surface water during operation

Infrastructure	Description
Livestock saleyard pens	<ul style="list-style-type: none"> Operating period: operation of the Kilty Station Yards typically occurs in the dry season (April to December in each year), minimising the potential for generation of contaminated stormwater; and Manure will be regularly removed from holding pens via a front end loader and tip truck to reduce build-up and risk of contamination of stormwater and groundwater. Manure will be immediately transferred from pens to be used as soil conditioner / fertiliser on the irrigation lots on Kilty Station.
Wastewater (contaminated stormwater) retention pond to capture runoff from livestock holding pens	<p>Construction of wastewater retention / evaporation pond with the following design parameters:</p> <ul style="list-style-type: none"> Stormwater flows to pond via an eastern perimeter catchment drain; minimum storage capacity of 1,000m³; lined with clay or similar impervious material; 400mm perimeter bund (above ground level) around the top of the pond embankments to mitigate stormwater ingress; operated to maintain a 500mm freeboard;

7.4.4 Key findings

The Delegated Officer has reviewed the information regarding the stormwater and leachate impacts from the premises and has found:

- 1. All contaminated stormwater generated on the premises will be collected and stored in appropriate infrastructure.***
- 2. The operating season of the Premises (during dry season only) will reduce potential for generation of contaminated stormwater.***

7.4.5 Consequence

Potential contamination of soils, surface water, and groundwater may occur as a result of stormwater becoming contaminated during operations. Contaminated stormwater and leachate emissions can result in a potential or actual alteration to the environment, impacting the health of ecosystems. Such emissions have the potential to disrupt ecological processes, affect the aesthetic appeal of waters, and cause eutrophication.

The Delegated Officer has considered the normal operating conditions at Kilty Station Yards, along with the nature and volume of wastes produced and the location of premises in terms of adjacent sensitive ecological receptors. The Delegated Officer considers there is the potential for mid-level on-site impacts and as such the consequence of emissions of contaminated stormwater and leachate is **moderate**.

7.4.6 Likelihood of consequence

Taking into consideration the design capacity of the Kilty Station Yards, as well as location of the yards and adjacent sensitive receptors, meteorological data, operating season and the proposed management measures, the Delegated Officer has determined the likelihood of consequence to be **possible**.

7.4.7 Overall rating

The Delegated Officer has compared the consequence and likelihood ratings described above through the Risk Matrix (Table 9) and determined that the overall rating for the risk of contaminated stormwater and leachate emissions impacting on sensitive receptors during operation is **medium**.

7.5 Summary of risk assessment and acceptability

A summary of the risk assessment and the acceptability of the risks with treatments are set out in Table 12 below. Controls are described further in section 8.

Table 12: Risk assessment summary

	Emission		Pathway and Receptor	Applicant controls	Impact	Risk Rating	Acceptability with treatment (conditions on instrument)
	Type	Source					
1.	Land runoff to surface water and infiltration to groundwater of contaminated stormwater and leachate during operations.	Contaminated stormwater, leachate, and wastewater	Stormwater runoff across the premises, overflow from wastewater pond	Infrastructure and management controls	Impacts on water quality and ecosystem health	Moderate consequence Possible likelihood Medium risk	Acceptable subject to Applicant controls conditioned

8. Determined Regulatory Controls

A summary of the risks with corresponding controls are set out in Table 13. The risks are set out in the assessment in section 7 and the controls are detailed in this section 8. Controls will form the basis of conditions in the issued works approval and licence.

Table 113: Summary of regulatory controls to be applied

		Controls (references are to sections below setting out details of controls)		
		8.1.1 Infrastructure and Equipment	8.2.1 Specified Action	8.2.2 Monitoring of inputs and outputs
Risk Items (see risk analysis in section 7)	1. Land runoff to surface water and infiltration to groundwater of contaminated stormwater and leachate during operations	●	●	●

8.1 Works Approval controls

8.1.1 Leachate and stormwater infrastructure and equipment

The Delegated Officer has considered the applicants proposal and in particular the infrastructure outlined in Table 14 below (relates to new holding yards only):

Table 14: Proposed infrastructure for management of leachate and stormwater water

Infrastructure	Controls
Livestock saleyard pens	<ul style="list-style-type: none"> Constructed of five rail galvanized cattle rail tubing with galvanized posts in concrete footings and will comprise a six pen configuration within an area 60m by 50m; 2 x certified organic holding yards; The yards will be partially shaded and will be constructed of compacted soil base; Capacity to hold up to 400 cattle at any one time; Includes associated infrastructure: <ul style="list-style-type: none"> Animal crush (strongly built stall or cage for holding cattle); associated loading / unloading infrastructure; catchment drain along eastern perimeter of stockyards that flows into the premises wastewater pond.
Wastewater (contaminated stormwater) retention pond to capture runoff from livestock holding pens	<ul style="list-style-type: none"> Stormwater flows to pond via an eastern perimeter catchment drain; minimum storage capacity of 1,000m³; lined with clay or similar impervious material; 400mm perimeter bund (above ground level) around the top of the pond embankments to mitigate stormwater ingress; operated to maintain a 500mm freeboard.
Dipping of cattle in the animal dip	<ul style="list-style-type: none"> To be constructed of 6mm mild steel with joins and seams welded on both sides; To be constructed such that the dip is impervious and allows no dip chemicals to discharge to the surrounding environment; and

Infrastructure	Controls
	<ul style="list-style-type: none"> Is roofed and designed such that splash barriers and drainage infrastructure prevents any discharges of the dip chemicals to the environment.
Carcass disposal pit	<ul style="list-style-type: none"> Located in northwest corner of premises; and Constructed to a depth of 4m

Grounds: The Delegated Officer considers that the provision, operation, and maintenance of the specified infrastructure and controls outlined in Table 15 are necessary to manage the medium risk of contaminated stormwater and leachate impacting the environment. These controls, which are based on the Applicant's commitments in the works approval application, will be included in the works approval as specified infrastructure to be constructed. In accordance with DER's Guidance Statement *Risk Assessments* (November 2016), DER has regard for applicant controls and where they lower the assessed likelihood or consequence of a risk event, these controls will be conditioned in the instrument.

8.2 Licence Controls

The controls outlined in section 8.2.1 will be imposed as conditions on the operating licence to manage the risk of stormwater and leachate during operation of the premises. It should be noted that these conditions are not final and will be subject to compliance with the conditions of the issued works approval and may change if additional information becomes available to further inform the risk assessment (as per DER Guidance Statement *Risk Assessments* (November 2016)).

8.2.1 Specified actions for contaminated stormwater and leachate risk

- Operating period: operation of the Kilty Station Yards will be approved to operate in the dry season only (between April to December in each year), minimising the potential for generation of contaminated stormwater; and
- The new wastewater evaporation pond must be managed such that:
 - a minimum top of embankment freeboard of 500mm is maintained;
 - storm water runoff is prevented from causing the erosion of outer pond embankments;
 - overtopping of the wastewater pond does not occur except as a result of an extreme rainfall event (greater than 1 in 10 year event of 72 hours duration);
 - vegetation and floating debris (emergent or otherwise) is prevented from encroaching onto pond surfaces or inner pond embankments;
 - a fence is kept in place to exclude livestock access to the wastewater pond; and
 - no overflow leaves the Premises;
- the carcass disposal pit must be managed such that:
 - In the event of an animal fatality, carcasses must be removed from stockyards within 12 hours and disposed of at the dedicated animal carcass pit on the premises;
 - carcasses and waste material are covered with at least 500mm of soil immediately upon deposit;
 - the number of animal carcasses buried and location of burial is recorded for the duration of the licence;
 - Animal carcass pit to be located at least 70m away from watercourses, 50m away from nearest property; and
 - a separation distance of at least 3m is maintained between groundwater table level and bottom of the carcass pit;
- manure shall be removed from the holding pens on at least a monthly basis to reduce build-up and risk of contamination of stormwater and groundwater;
- manure shall be immediately transferred from pens and taken to Kilty Station irrigation lots for use as a soil conditioner / fertiliser (no stockpiling of manure will be permitted at the

- livestock yards);
- the dip and dipping area must be operated to prevent the loss or overflow of chemicals.

Grounds: The risk of contaminated stormwater and leachate impacting the environment has been assessed as medium. The main controls include a stormwater management system that will include a clay-lined wastewater retention / evaporation pond and associated drainage infrastructure, as well as regular removal of manure generated during operations.

8.2.2 Monitoring requirements

The applicant will be required to maintain accurate and auditable records in relation to the dates and numbers of animals held at the premises and deceased animals disposed of in the animal carcass pit. The Licensee must also monitor volumes of manure removed from the premises.

8.2.3 Monitoring reports

An Annual Environmental Report will be required to be submitted under licence conditions detailing the monitoring specified in section 8.2.2. An Annual Audit Compliance Report will also be required to be submitted as a condition of the operating licence.

9. Appropriateness of Works Approval conditions

The conditions in the Issued Works Approval in Attachment 1 have been determined in accordance with DER's *Guidance Statement on Setting Conditions*.

Condition Ref	Grounds
Infrastructure and Equipment Condition 1, 2, 3 and 4	These conditions are valid, risk-based and contain appropriate controls (see section 8.2).
Emissions 5	These conditions are valid, risk-based and enable flexibility in operations.
Information 6 and 7	These conditions are valid and are necessary administration and reporting requirements to ensure compliance.

DER notes that it may review the appropriateness and adequacy of controls at any time, and that following a review, DER may initiate amendments to the works approval under the EP Act.

10. Applicant's comments

The applicant was provided with the draft decision report and draft works approval on 21 March 2017. Comments on the draft documents were received on 29 March 2017 (see Appendix 2 for summary of applicant comments on draft decision report and works approval).

11. Conclusion

This assessment of the risks of activities on the premises has been undertaken with due consideration of a number of factors, including the documents and policies specified in this decision report (summarised in Appendix 1).

Based on this assessment, it has been determined that the Issued works approval will be granted subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

The Works Approval Holder will be required to apply for a Category 55 licence to allow operations at the premises to commence.

Caron Goodbourn

A/Manager (Process Industries)

Delegated Officer under section 20 of the *Environmental Protection Act 1986*

Appendix 1: Key Documents

	Document Title	Availability
1	DER <i>Guidance Statement on Regulatory principles</i> , July 2015	accessed at http://www.der.wa.gov.au
2	DER <i>Guidance Statement on Setting conditions</i> , October 2015	
3	DER <i>Guidance Statement on Licence duration</i> , November 2014	
4	DER <i>Guidance Statement on Licence Duration</i> , August 2016	
5	DER <i>Guidance Statement on Risk Assessment</i> , February 2017	
6	DER <i>Guidance Statement on Decision Making</i> , February 2017	
7	DER <i>Guidance Statement on Environmental Siting</i> , November 2016	
8	Yeeda Pastoral Company Pty Ltd, 14 December 2016, <i>Application for Works Approval – Kildo Station</i>	DER Records (A1343220)
9	Yeeda Pastoral Company Pty Ltd, 26 January 2017, <i>Re: Kildo Station Yards – application accepted letter and works approval fee invoice</i> (including all attachments)	DER Records (A1365904)
10	Yeeda Pastoral Company Pty Ltd, 16 March 2017, <i>Re: Request for clarification - Yeeda Pastoral Company Pty Ltd - Kildo Station - category 55 works approval application</i> (including all attachments)	DER Records (A1395689)

Appendix 2: Summary of Applicant's Comments on Risk Assessment and Draft Conditions

Comments received	Environmental risk	DER consideration of risk:
<p>Yeeda Pastoral Company Pty Ltd</p> <ul style="list-style-type: none"> Reference to perennial watercourse located 55m west of Premises boundary is inaccurate; no watercourse exists in this location; Request control (licence condition) specifying required buffer distance to nearest watercourse be revised. 	<ul style="list-style-type: none"> N/A Control has been updated to amend licence condition to require a 70m buffer distance to any watercourse 	<ul style="list-style-type: none"> Decision report updated to remove inaccurate reference to watercourse located 55m west of premises boundary; Risk assessment is not changed. Additional controls will be required when operating the Carcass Disposal Pit including a minimum 3m separation distance to groundwater (actual separation distance likely to be 10m), immediate burial and progressive capping is required. The existing watercourse located 70m to the east of the Premises only flows in large rainfall events. No sensitive receptors present.