

SUMMARY OF SUBMISSIONS
PA21/358 - Lot 505 Yangedi Road, Keysbrook – 57300 – Abattoir Amendment

Submitter	Submitter Comments	Applicant Response	Officer Comments
DWER	<p><i>Lot 504 Yangedi Road, Keysbrook – Amendment to Abattoir</i></p> <p>Thank you for providing the development application received 21 April 2021 for the Department of Water and Environmental Regulation (Department) to consider.</p> <p>The Department has identified that the abattoir's proposed increase in output from 100 tonnes to 500 tonnes at Lot 504 Yangedi Road in Keysbrook has the potential for significant impact to water resources, and insufficient information has been provided to demonstrate such impacts can be managed. The Department therefore objects to the proposal in its current form. Key issues and recommendations are provided below, and these matters must be addressed to the satisfaction of the Department.</p> <p>Issue</p> <p>Peel Harvey Coastal Plain Catchment</p> <p>Recommendation</p> <p>The proposal is located within the Peel-Harvey coastal plain catchment. Developments such as abattoirs, including the irrigation of wastewater, has the potential to export significant nutrient loads to the Peel-Harvey Estuary System. Subsequently this development application is subject to the following state policies and regulations:</p> <ul style="list-style-type: none"> • <i>Environmental Protection Peel Inlet - Harvey Estuary Policy (EPP)</i> (EPA,1992); • <i>State Planning Policy 2.1 (SPP 2.1) Peel Harvey Coastal Plain Catchment</i> (WAPC, 2003); and • Environmental Protection (Abattoir) Regulations 2001. 	<p>The applicant has responded to DWER's initial submission through the submission of Issue 6 of the NIMP, as attached to this report.</p>	<p>Acknowledged and addressed in the body of the Council Report.</p>

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	<p>The below guiding documents provides further specific reference to achieving the intent, and overall nutrient targets, of the aforementioned policies with respect to rural land practices with the objective of reducing nutrient loads into the catchment.</p> <ul style="list-style-type: none"> • <i>Water Quality Improvement Plan for the Rivers and Estuary of the Peel-Harvey System</i> (EPA, 2008); • <i>Peel-Harvey Estuary Protection Plan (Bindjareb Djilba)</i> (DWER, 2020); • <i>Hydrological and nutrient modelling of the Peel-Harvey catchment</i> (DoW, 2011); • <i>Water Quality Protection Note 98 – Rural abattoirs</i> (DoW, 2007); • <i>Industry Regulation fact sheet – Abattoir</i> (DWER, 2018); and • <i>Agriculture Futures: Potential rural land uses on the Palusplain</i> (DAFWA 2012). <p>The Peel-Harvey EPP establishes phosphorous loading targets for the Peel-Harvey Estuary System to be adhered to by new (and the expansion of existing) proposals. As specified within the Department's report Hydrological and nutrient modelling of the Peel-Harvey catchment (DoW, 2011), to comply with the EPP target, this operation would be required to achieve either:</p> <ul style="list-style-type: none"> • an application to land rate of no more than 6.5 kg/ha/year total phosphorous (TP); or • an export rate of 0.29kg/ha/year TP. <p>The aforementioned report also sets targets for total nitrogen (TN) as:</p> <ul style="list-style-type: none"> • an application to land rate of no more than 45 kg/ha/year TN; or • an export rate of 2.4 kg/ha/year TN. <p>Furthermore, it is noted the geology of the site is Bassendean Sand which has low fertility, is poorly nutrient retentive and is susceptible to leaching, which is also</p>		

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	<p>indicative of why such soils are not considered suitable to support intensive agriculture in the Peel-Harvey catchment.</p> <p>The onus of proof rests with the proponent to demonstrate any proposal meets the objectives of the aforementioned policies and guidance plans through the preparation, submission and approval of a Nutrient and Irrigation Management Plan (NIMP) to support the development application.</p> <p>A NIMP has been prepared and submitted with this development application. The report does not demonstrate that the proposed activities and existing infrastructure is capable of managing the increased nutrient loads to meet the required nutrient targets detailed above.</p> <p>The nutrient balance provided in the NIMP is considered insufficient. Calculations undertaken by the Department derived from information provided in the proponent's report identifies nutrient application to land from the irrigation of wastewater to be significantly higher than the input rate targets of 45 kg/ha/year for nitrogen and 6.5 kg/ha/year for phosphorus.</p> <p>As such, for any expansion to the abattoir's output to meet the aforementioned policy requirements, an improved waste management and wastewater treatment system will most likely be required.</p> <p>Further detail is provided in attachment 1. These comments should be reviewed and actioned alongside comments from the Department of Primary Industries and Regional Development.</p> <p>Issue</p> <p>Industry Regulation</p> <p>Advice</p> <p>The Department regulates emissions and discharges from the construction and operation of prescribed premises through a works approval and licensing process, under Part V, Division 3 of the <i>Environmental Protection Act 1986</i> (EP Act).</p>		

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	<p>The categories of prescribed premises are outlined in Schedule 1 of the <i>Environmental Protection Regulations 1987</i>.</p> <p>The EP Act requires a works approval to be obtained before constructing a prescribed premises and makes it an offence to cause an emission or discharge from an existing prescribed premises unless they are the holder of a works approval or licence (or registration) and the emission is in accordance with any conditions to which the licence or works approval is subject.</p> <p>The provided development referral request was reviewed in relation to works approval and licence requirements under Part V Division 3 of the EP Act.</p> <p>Based on the information provided, the proposed operations were considered as per Schedule 1 of the <i>Environmental Protection Regulations 1987</i> for the following category:</p> <table><tr><th>Category</th><th>Category description</th><th>Production or design capacity</th></tr><tr><td>15</td><td>Abattoir: premises on which animals are slaughtered.</td><td>1,000 tonnes or more per year</td></tr></table> <p>The information provided indicates that the proposal is unlikely to cause the premises to be considered a prescribed premises based on the proposed increase from 100 tonnes per annum to 500 tonnes per annum which is below the threshold of category 15. However, the Department's published <i>Industry Regulation Fact Sheet: Abattoir</i> (DWER, 2018) available at https://www.der.wa.gov.au/images/documents/our-work/licences-and-works-approvals/IR-FS-22_Abattoirs_v1.1.pdf, states that the production or design capacity under category 15 is based on the hot carcass weight of slaughtered animals. The information provided did not clarify the calculation basis for the 500 tonne per annum stated throughput.</p>	Category	Category description	Production or design capacity	15	Abattoir: premises on which animals are slaughtered.	1,000 tonnes or more per year		
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	<p>The <i>Fact Sheet</i> also notes that while abattoirs with a production or design capacity between 100 and 1,000 tonnes per year do not fall into category 15, abattoirs between 100 and 1,000 tonnes per year are regulated under the <i>Environmental Protection (Abattoir) Regulations 2001</i>. The proposal is to process 500 tonnes, therefore the proposal must demonstrate compliance with the <i>Regulations</i> including the requirement for a wastewater treatment system. The proposal does not include a wastewater treatment system to manage nutrients and contaminants.</p> <p>The occupier will also need to comply with the <i>Environmental Protection (Noise) Regulations 1997</i> irrespective of whether the premises is prescribed or not.</p> <p>Note that this advice is provided based on the information provided. Should this information change, the works approval and/or licensing requirements may also change. Applicants are encouraged to contact the Department to clarify requirements, should there be changes to information.</p> <p>Where the Department has a statutory role, planning applications should be considered prior to the Department issuing any relevant permits, licenses and/or approvals.</p> <p>In the event there are modifications to the proposal that may have implications on aspects of environment and/or water management, the Department should be notified to enable the implications to be assessed.</p> <p>Should you require any further information on the comments please contact Jane Sturgess on 9550 4228.</p>		
DPIRD	<p>COMMENT: Lot 504 Yangedi Road, Keysbrook - Proposed Amendment to Approved Abattoir</p> <p>Thank you for the opportunity to comment on the proposed amendment to the approved abattoir at Lot 504 Yangedi Road, Keysbrook.</p> <p>The Department of Primary Industries and Regional Development (DPIRD) reviewed the expansion application for the abattoir at the abovementioned lot and</p>	<p>The applicant has responded to DPIRD's initial submission through the submission of Issue 6 of the NIMP, as attached to this report.</p>	<p>Acknowledged and addressed in the body of the Council Report.</p>

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	<p>deems the current operation as well as the proposed expansion of the facility to be unacceptable for the following reasons:</p> <ol style="list-style-type: none"> 1. There is no evidence of any wastewater treatment occurring on the premises and no sampling results that identifies the nutrient content of the wastewater. It is therefore highly questionable whether the current practice of applying liquid waste to the land should continue. 2. No evidence is provided for any nutrient export within the Nutrient Irrigation Management Plan (NIMP). <ol style="list-style-type: none"> a. Regardless of arguments made as to which method should or should not be used, the nutrient management plan has failed to demonstrate the quantity and method of any nutrient export. b. A Phosphorous fertiliser mass balance is required to demonstrate the removal pathway of nutrients applied to the 40ha of pasture land. 3. Wastewater volumes and nutrient production is grossly understated in the NIMP: <ol style="list-style-type: none"> a. The average water quantity that a small domestic facility uses to process a sheep is 90-150 L/head (<i>Review of abattoir water usage reduction, recycling and reuse. MLA, 2008</i>). Wastewater production within the processing facility is reported to be 7.5-times lower than national operating practices. This is also the case when compared to data taken from the compliance reports of three comparable WA abattoirs. This raises health concerns as the premises has meat for human consumption approval as of 12/12/2019. If wastewater volumes stated in the NIMP are correct, DPIRD recommends that the application be referred to the Department of Health. b. There is an erroneous approach to the characterisation of the wastewater nutrient content, as the summation of animal excreta does not represent the waste generated during processing. Reported Nitrogen and Phosphorous generation (kg/year) is at least 3-4 times lower than expected and this 		

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	<p>includes the adjustments made for the facility (i.e. lack of tallow processing, blood processing, gut washing, etc.).</p> <p>c. Erroneous dilution calculations for items AN and AO is presented in Table 8. Wastewater dilution is double-counted and does not consider the already nutrient-loaded groundwater being used to dilute.</p> <p>4. Dilution of waste streams does not change the nutrient loading onto the soil, but only increases the hydraulic loading.</p> <p>a. WQPN 22 outlines methods for land irrigation to address nutrient loading onto soil and states <i>"Our aim to ensure that resources are used efficiently, that land is not degraded or waterlogged and that natural waters are protected from salinity, turbidity, nutrient-enrichment, leached trace metals, pesticides and other harmful wastewater contaminants"</i>. Arguments made in sections 9.2 and 14 (pages 20 and 21) of the NIMP stating that the wastewater is not nutrient-rich are misleading and groundwater separation and extensive monitoring should therefore be a requirement as per WQPN 22.</p> <p>b. Detailed hydraulic loading combined with evapotranspiration rates must be provided to justify the irrigation rates.</p> <p>DPIRD would like to highlight the importance of wastewater treatment of heavily loaded wastewaters such as those from abattoirs. The current elevated groundwater nutrient concentrations are an indicator of insufficient treatment and nutrient offtake (the groundwater (TN) concentration of 71 mg/L is equivalent to raw municipal sewage). This is an unacceptable groundwater reading anywhere on the Swan Coastal Plain, let alone within the Peel Harvey catchment. Dilution of waste does not remove any nutrients, stabilise organic matter or reduce total pathogen content in the waste.</p> <p>DPIRD recognises the importance of agribusiness growth, and recommends the following steps be taken prior to expansion:</p>		

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	<ol style="list-style-type: none"> 1. Wastewater sampling to quantify nutrient content and accurate wastewater production volume. 2. The installation of wastewater treatment to stabilise the wastewater. 3. The implementation of a cropping regime that is designed to remove fertiliser and wastewater inputs from the land. <p>If you have any queries regarding the comments, please contact Leon van Wyk at (08) 9780 6171 or leon.vanwyk@dpird.wa.gov.au.</p>		
DOH	<p>Proposed Amendment to Approved Abattoir – Lot 504 Yangedi Road, Keysbrook</p> <p>Thank you for your letter of 21 April 2021 requesting comments from the Department of Health (DOH) on the above proposal.</p> <p>The DOH has no objection to the proposed amendment to approved abattoir.</p> <p>Should you have any queries or require further information please contact Franziska Marian on 9222 2000 or eh.eSubmissions@health.wa.gov.au</p>	N/A	Acknowledged.
A57500	<p>Dear Sir,</p> <p>We strongly object to the above proposal on the following ground.</p> <ol style="list-style-type: none"> 1) It's a highly polluting industry 2) It's too close to many residents 3) It will devalue the price of all properties around. 	The applicant has responded to the submission through the submission of Issue 6 of the NIMP, as attached to this report.	Acknowledged and addressed in the body of the Council Report.