Memorandum:

Date: 22 May 2025 **Our ref:** ECA-054

From: [redacted]

Company: Enviro Consulting Australia

Contact: [redacted]

To: Application Submissions

Company: Department of Water and Environment Regulation (DWER)

Email: [redacted]

Cc: [redacted]

Re: APPLICATION FOR A LICENCE UNDER PART V OF THE ENVIRONMENTAL PROTECTION ACT 1986 (WA)

Please find enclosed an application for Morris Hospitality Pty Ltd that operate CBCo Brewing located at 561 Osmington Road, Bramley, WA, 6285.

The application includes the following documents:

- This memorandum and supporting appendices;
- A completed licence application form signed by the applicant;
- A report by Enviro Consulting Australia entitled:
  'Site and Soil Evaluation and Wastewater Management Plan, Existing Brewery, 561 Osmington Road, Bramley WA 6285, Revision 3, May 2025' (SSE and WMP);
- A copy of the CBCo Brewing Business Plan summary (confidential); and
- A draft licence prepared by Enviro Consulting Australia.

Morris Hospitality Pty Ltd is seeking approval from DWER to implement all conditions contained in the draft licence.

1 BACKGROUND

Morris Hospitality Pty Ltd operate CBCo Brewing that manufactures beer and cider at the premises located at 561 Osmington Road, Bramley in Western Australia.

The brewery has been operating at this site since 2004 and was the first brewery to be established in the heart of Western Australia's south-west wine region.

Morris Hospitality Pty Ltd is proposing to seek a licence under Part V of the Environmental Protection Act 1986 (WA) for *'Category 25: 'Alcoholic beverage manufacturing: premises on which an alcoholic beverage is manufactured and from which liquid waste is to be discharged onto land or into waters'* issued by the Department of Water and Environment Regulation (DWER).

The site has historically operated at less than the *'Category 25'* threshold of 350,000 litres of beverage per annum and will likely operate at less than this threshold in the foreseeable future. The licence is sought as a precaution to ensure compliance with CBCo Brewing's obligations under Environmental Protection Act 1986 (WA).

2 DEVELOPMENT APPROVALS

CBCo Brewing operates under multiple development approvals as documented in the SSE and WMP.

It is noted that Planning Approval Consent No. P210018 dated 14 April 2010 includes site plans detailing the future development of avocado and citrus in some of the areas currently utilised for pasture production and planned to be irrigated with brewery wastewater. The avocado and citrus have not been established in these areas and are no longer proposed to be planted in these locations.

CBCo Brewing has integrated brewing activities into the site's meat production agricultural activity by the brewery providing:

1. pasture with source of nutrients (i.e. fertiliser); and
2. animal feed in the form of spent grain and waste yeast.

Meat grown on the property is currently sold in the venue (i.e. the site contains a 'Paddock to Plate' venue).

CBCo Brewing propose to amend the site plans for Planning Approval Consent No. P210018 as part of a future development application to sell fresh meat grown on the property directly to the public. This is documented in the confidential CBCo Brewing Margaret River Business Plan summary.

The planned amendment to the site plans for Planning Approval Consent No. P210018 will further facilitate the integration of brewing activities into the meat production agricultural business.

3 LICENCE FEES

Wastewater characteristics and assumptions used calculate licence fees are outlined in Table 3.1.

Once the licence is issued, and a wastewater sampling port is installed on the pipe line to the land application areas, representative wastewater samples will be routinely collected to define the operational parameters outlined in Table 3.1.

Table 3.1 Wastewater parameters used to calculate licence fees

Parameter	Adopted value	Comment
Beverage (beer and cider) volume	200,000 litres per annum	This is the planned level of onsite beer and/or cider production over the next 12 months. This value is less than the proposed licence limit of 500,000 litres per annum.
Wastewater volume	1,000,000 litres per annum	This value assumes that 5 litres of wastewater is produced for every litre of beer or cider produced onsite.

Parameter	Adopted value	Comment
		Once the licence is issued and wastewater volumes will be measured using a wastewater flow meter.
	2,740 litres per day	Calculated by dividing the annual volume by 365.
Biochemical Oxygen Demand (BOD)	7,070 mg/L	This is an estimate only and is based on Table 5.2 of the SSE and WMP for the site.
	19.37 kg/day	Calculated by multiplying the estimated concentration by the estimated daily wastewater flow.
Total phosphorus	50 mg/L	This is an estimate only and is based on Table 5.2 of the SSE and WMP for the site.
	0.14 kg/day	Calculated by multiplying the estimated concentration by the estimated daily wastewater flow.
Total nitrogen	80 mg/L	This is an estimate only and is based on Table 5.2 of the SSE and WMP for the site.
	0.2 kg/day	Calculated by multiplying the estimated concentration by the estimated daily wastewater flow.
Total suspended solids	1,491 mg/L	This is an estimate only and is based on the recorded value for Rocky Ridge Brewing Co 2025 Annual Environmental Report. No data is available for the CBCo Brewing site.
	4.08 kg/day	Calculated by multiplying the estimated concentration by the estimated daily wastewater flow.
Total Dissolved Solids	3,650 mg/L	This is an estimate only and is based on the recorded value for Rocky Ridge Brewing Co 2025 Annual Environmental Report. No data is available for the CBCo Brewing site.
	10.00 kg/day	Calculated by multiplying the estimated concentration by the estimated daily wastewater flow.

Licence fee calculations used to support the application for a Part V licence are summarised in Table 3.2.

Table 3.2 Licence fee calculations

Parameter	Conversion factor for Part 3 waste	Units	$/unit	Fee ($)	Comment
Part 1 fee	N/A	50	43.45	2,166.02	The number of units is based less the 2,000 tonnes per annum.
Part 2 fee	N/A	0	N/A	0.00	There is no Part 2 waste
Part 3 fee BOD	0.5/kg	9.68	62.50	605.31	Conversion factors are based on the Environmental Protection Regulations 1987 (WA) for Part 3 waste. The premises is not located on the Swan Coastal Plain.
Part 3 fee Phosphorus	2.0/kg	0.27	62.50	17.12	
Part 3 fee Nitrogen	2.0/kg	0.44	62.50	27.40	
Part 3 fee Total suspended solids	0.5/kg	2.04	62.50	127.65	
Part 3 fee Total dissolved solids	0.05/kg	0.50	62.50	31.25	
Total				**$2,981.23**	Sum of Part 1, Part 2 and Part 3 fees.

4 SURFACE WATER LICENCE

A copy of the sites surface water licence is included in **Appendix 2.**

5 DRAFT LICENCE

Morris Hospitality Pty Ltd engaged Enviro Consulting Australia to review the operation of the site to recommend strategies for the sustainable management of wastewater from the existing brewery, with improved agricultural and environmental outcomes.

Enviro Consulting Australia incorporated the findings of the review in a Site and Soil Evaluation and Wastewater Management Plan (SSE and WMP). The recommendations of the SSE and WMP have been converted into draft licence that is included with this application.

Enviro Consulting Australia used the draft licence dated 12 March 2025 issued to Rocky Ridge Brewing Co as a basis for the draft licence for the CBCo Brewing site. Table 5.1 provides relevant comments on specific sections and conditions included in the draft licence. This table focuses on items that are specific to the CBCo Brewing site.

Morris Hospitality Pty Ltd is seeking approval from the Department of Water and Environmental Regulation (DWER) to implement the draft licence.

Enviro Consulting Australia

Table 5.1 Comments on draft licence conditions

Licence condition	Aspect	Comment
Page 1	Licence holder details	The site is owned by CLG Properties Pty Ltd. The site is operated by Morris Hospitality Pty Ltd trading under the trading name CBCo Brewing. Because Morris Hospitality Pty Ltd is operating the site, Morris Hospitality Pty Ltd will be the licence holder. Morris Hospitality Pty Ltd lease the site from CLG Properties Pty Ltd. The following supporting documents are included in the appendices of this memorandum: • **Appendix 1**: A copy of the lease for the site; • **Appendix 3:** Certificate of title; and • **Appendix 4**: ASIC Company name search results for: a. CBCo Brewing; b. Morris Hospitality Pty Ltd; and c. CLG Properties Pty Ltd (i.e. the property owner).
	Premises details	Premises details are from the Certificate of Title (**Appendix 3**)
	Assessed production capacity.	The assessed production capacity is based on the capacity of the Land Application Areas to receive wastewater. Refer to the SSE and WMP prepared by Enviro Consulting Australia for further details.
Condition 1	Table 1	**Production limit:** Production limit are included as follows: • Beer and cider limit based on the SSE and WMP prepared by Enviro Consulting Australia. • The wastewater limit assumes a ratio of wastewater to beverage of 5 to 1. **Wastewater volume limit:** The wastewater volume limit is based on the capacity of the proposed Land Application Areas to accept wastewater. Calculations and assumptions are outlined in the SSE and WMP.

Licence condition	Aspect	Comment
Condition 2	All	Outlines the infrastructure that CBCo Brewing is seeking approval for. CBCo Brewing will also require approval from the Department of Health (DoH) to install wastewater management components. Approval from the DoH cannot be sought until after the DWER licence is approved. CBCo Brewing has requested 180 days after issuing of licence to allow for the processing of the DoH approval and install the required infrastructure. It is noted that the process of seeking DoH approval may result in delays installing the wastewater infrastructure.
	Table 2, Row 3	CBCo Brewing currently feed spent grain and solids to onsite cattle and sheep. CBCo Brewing also provide spent grain and solids (i.e. waste yeast) to local farmers as stock feed. This is a long-standing practice at this site and a common practice for breweries located in Western Australia. This feed is collected from the hardstand area of the loading dock after it has cooled. Drainage from the from the IBCs that contain the spent grain and solids is collected in a dedicated plastic bund (refer to SSE and WMP for a photo). Once the spent grain and solids have been collected the plastic bund is emptied onto the floor of the Beverage Manufacturing Facility and is collected via the drainage system and diverted to the Wastewater Treatment and Storage Compound (WTSC).
	Table 2, Row 14	CBCo Brewing proposes to irrigate the Land Application Areas (LAAs) using a travelling irrigator that is periodically re-located between the LAAs. Approval is requested to also be able to install fixed sprinklers as a backup means of irrigating wastewater, however CBCo Brewing has indicated that fixed sprinklers are unlikely to be installed.
Condition 3 and 4	All	The conditions are standard DWER conditions. Added requirement to report flow meter serial number, once installed.
Condition 5	Table 3	This table outlines the controls recommended by Enviro Consulting Australia.
	Table 3, Row 6.	Item ‘m’ – control added requiring a site-based rainfall sensor and an automated process to cease irrigation if more than 3 mm of rainfall is measured on the sensor during the 24 hour period midnight to midnight.
	Table 3, Row 8	**Background:** At the CBCo Brewing site, pasture is managed under a Regenerative Agriculture regime.

Licence condition	Aspect	Comment
		The regenerative method of management includes the following main components on this farm: • The use of grazing animals to control weeds via strategic 'crash grazing' and by using two types of grazing animals (i.e. sheep and cattle) with different grazing habits; • At the start of each growing season (i.e. April to June), the paddocks are heavily grazed to remove weeds and biomass and to stimulate pasture growth for the wet season; • Once the pasture starts to grow, it is permitted to grow out and then heavily grazed again (e.g. somewhere in the period June to July, subject to seasonal conditions) to remove the weed burden and stimulate growth of beneficial pasture species; • Once the weed burden has been reduced, the pasture is fertilised (if required) with nitrogen fertiliser to stimulate the growth of beneficial pasture that can be harvested and allow it to outcompete weeds. At this point (e.g. around late July, early August, subject to seasonal conditions), stock are excluded and the beneficial pasture is permitted to be grown out; and • The pasture is harvested at the end of the wet-season (typically around the end of October, subject to seasonal conditions). Stock are not permitted to graze the pasture from the point of exclusion around late July/early August until after it has been harvested. Land Application Areas 1 and 2 also have an established kikuyu pasture with roots measured at the time of the soil investigation down to around 3 metres below ground level. Kikuyu does not grow during the cooler months (i.e. the wet season) and the biomass from this pasture needs to be removed by grazing to enable the winter pasture (i.e. what is harvested) to be established. CBCo Brewing have an irrigation licence that allows them to irrigate the kikuyu pasture (i.e. LAAs 1 and 2) during the summer months to produce additional biomass during the summer period when other sources of available pasture are scarce. **It is noted that if DWER propose to prevent grazing (i.e. via a licence condition) during the period from 01 April until 31 July, this will result in weeds not being able to be effectively managed.** In turn, this will result in the harvesting of pasture that is contaminated with weeds and is unusable as stock

Licence condition	Aspect	Comment
		feed (i.e. due to the weed and weed seed burden). This in turn will result in negative environmental outcomes on this site and offsite if the harvested pasture is sold. **Enviro Consulting Australia highlight that it is critical that CBCo Brewing is able to manage the weed burden at the start of the wet-season growing season (i.e. from April until the end of July each year) via a strategic "crash grazing" method.** **Pasture yield:** The SSE and WMP conservatively limited nutrient loading calculations to the amount of pasture that will be grown out and harvested during the stock exclusion period (i.e. from 01 July until 30 October 2025 each year). It is also noted that due to the irrigation licence and the existing established kikuyu pasture, LAA1 and LAA2 have potential to produce a further 15 tonnes of harvestable kikuyu biomass during the summer growing season. As a conservative measure, the SSE and WMP (and proposed licence conditions) has only allowed for harvesting pasture following the stock exclusion period in the nutrient loading calculations. There is ample opportunity for changing management practices to facilitate additional nutrient uptake, if soil monitoring indicates that nutrients are starting to accumulate within the LAA's in the future. **Stock Access Controls:** CBCo Brewing has a limited quantity of stock compared to a larger brewery like Rocky Ridge Brewing Co. They also employ a strategy of allowing sheep to graze after cattle to remove pasture and weeds at a level that is closer to the ground. Due to the difference in grazing methods and availability of stock at Rocky Ridge that are not available at CBCo Brewing, CBCo Brewing will require cattle and sheep to be in a paddock up to 1 month at a time to provide for an effective grazing regime.

Licence condition	Aspect	Comment
		Licencing controls have therefore limited grazing to periods not exceeding one month (i.e. 4 weeks) at a time outside of the Stock Exclusion Period, this differs from Rocky Ridge Brewing Co which has a draft licence limit of grazing not exceeding 2 weeks at a time.
Condition 6	Table 4, Row 2	It is noted that the site currently provides spent grain to local farmers as a source of animal feed. This is a standard practice for breweries operating in Western Australia.
Condition 7 to 10	All	These are standard DWER conditions, taken from the draft Rocky Ridge licence.
Condition 12	Table 6	This is a standard DWER condition taken from the draft Rocky Ridge licence. Added a requirement to measure the exchangeable sodium percentage at the most electromagnetic conductive part of each LAA. This is because sodium will tend to accumulate where salts tend to accumulate (i.e. the sampling regime will target the most sodic area by using an electromagnetic induction survey). Sodic soils have potential develop due to the use of sodium contained in chemicals used to clean vessels in the brewery.
Condition 13	All	This is a standard DWER condition taken from the draft Rocky Ridge licence, adapted to the site.
Condition 14	All	This is a standard DWER condition taken from the draft Rocky Ridge licence, adapted to the site. Loading limits are from the SSE and WMP. A SAR limit not included. It may not be reasonable and practical to maintain the SAR of wastewater within the stable range. High SAR values are managed by the requirement (Condition 16) to undertake a review if high SAR values are obtained during routine monitoring. If it is found that it is reasonable and practical to maintain the SAR of wastewater within the soil stable range (i.e. as indicated by routine wastewater monitoring), then there is no objection to including a SAR limit in future iterations of the licence.
Conditions 15 to 23	All	These are standard DWER conditions taken from the draft Rocky Ridge licence.
	Table 9.	Table 9 was adapted for the CBCo Brewing site.
Definitions	All	Definition added to for “Stock Exclusion Period” and “Qualified Environmental Scientist”.
Schedule 1	All	Updated figures are included.

6 CLOSING

Should you require clarification, or would like to meet in person or by phone, please do not hesitate to contact me.

[redacted]