



## Application for Licence Amendment

### Division 3, Part V *Environmental Protection Act 1986*

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<b>Licence Number</b>	L6112/1996/11
<b>Licence Holder</b>	Borrello Holdings (WA) Pty Ltd
<b>ACN</b>	150 463 332
<b>File number</b>	APP-0028644
<b>Premises</b>	Gingin Meatworks 326 Cockram Road LENNARD RROOK WA 6503
<b>Date of Report</b>	8 August 2025
<b>Status of Report</b>	Final

# 1. Amendment description

This amendment is made pursuant to section 59 of the *Environmental Protection Act 1986* (EP Act) to amend the existing licence issued under the EP Act for a prescribed premises as set out below. This notice of amendment is hereby given under section 59B(9) of the EP Act.

Licence L6112/1996/11 is held by Borrello Holdings (WA) Pty Ltd (licence holder) for Gingin Meatworks (the premises), located at 326 Cockram Road, Lennard Brook, Western Australia 6503. The premises relates to category 15 and category 83 and the assessed production capacity under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) which are defined in Licence L6112/1996/11.

This amendment relates to the extension of the existing irrigation area on the premises via the incorporation of a new irrigation area (Plot C) as shown in Schedule 1, Figure 1 of the amended licence. No other changes to the aspects of the existing licence relating to category 15 and category 83 have been requested by the licence holder. This amendment report documents the assessment of the potential risks to the environment from the operation of Plot C on the premises.

In completing the assessment documented in this report, the Department of Water and Environmental Regulation (the department) has considered and given due regard to its regulatory framework and relevant policy documents which are available at <https://dwer.wa.gov.au/regulatory-documents>.

## 1.1 Purpose of assessment

On 17 April 2025, the licence holder submitted an application to the department to amend Licence L6112/1996/11 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act).

Condition 5 of the existing licence requires the licence holder to discharge treated wastewater to land, only at the authorised locations specified in Table 5 of the existing licence as Plot A and Plot B. The licence holder is seeking approval to expand the authorised area for disposal of treated wastewater on the premises from 5.65 to 10.72 hectares (ha) via the addition of Plot C on Lot 343 to the west of the current irrigation areas.

The primary reason for this amendment is to improve the current wastewater treatment system (WWTS) and to allow a transfer of irrigation to Plot C using existing infrastructure.

## 1.2 Premises background

The licence holder operates an abattoir and fellmongering facility at the premises in the Shire of Gingin, north of Perth. The current assessed production capacity for the premises is no more than 14,000 tonnes (hot standard carcass weight) per annual period for category 15 and no more than 60,500 animal skins or hides processed per annual period for category 83.

The abattoir is located within a rural area, with surrounding land predominantly utilised for agricultural purposes including market gardens, farming and other rural activities. There are sensitive receptors including rural residence within 500 m of the abattoir infrastructure, WWTS, livestock holding pens and irrigation area. Additionally, Lennard Brook and a seasonal tributary to Lennard Brook flow within the premises. Regulatory controls reflect the need to protect these receptors.

Wastewater from the abattoir is biologically treated within a four-pond WWTS that includes two anaerobic ponds, an aerobic pond and a holding pond. Treated wastewater is irrigated to two existing irrigation plots (Plot A and Plot B) in the northeastern corner of the premises. Ambient environmental monitoring occurs monthly, quarterly and annually on the premises for the surface water, groundwater and soil, which is specified in condition 9, condition 10 and condition 11 of the existing license.

Plot A and Plot B are comprised of cleared paddocks and are required by condition 5 of the

existing licence to be maintained with vegetation. The soil type of these plots is sandy gravel with a low clay content which allows for good water uptake but also allows for good moisture dispersion to avoid saturation issues.

A major issue associated with the current operation has been the management of total nitrogen (TN) and total phosphorus (TP) in the irrigation areas as there continues to be ongoing exceedances of the licensed nutrient loading limits. Nutrient loads of 404.1 kg/ha/annual period for TN and 83.9 kg/ha/annual period for TP, respectively, were reported in the 2023 Annual Audit Compliance Report (ACR) for the premises. These rates significantly exceed the nutrient loading limits of 300 kg/ha/annual period for TN and 50 kg/ha/annual period for TP that are set by condition 6 of Licence L6112/1996/11. The licence holder advises that in conjunction with the proposed expansion of the irrigation area, they are actively seeking to advance the current WWTS. Improvements to existing wastewater management infrastructure and practices are being investigated, along with a proposed upgrade of the abattoir itself.

## **2. Proposed amendment**

The licence holder proposed an expansion of the current irrigation area on the premises to improve current wastewater management practices and reduce the risk of applied nutrients causing impacts to groundwater or surface water.

The licence holder has proposed the addition of Plot C to west of the current irrigation area on Lot 343, as seen in Schedule 1, Figure 1 of the amended licence. This area is approximately 5.07 ha and is comprised of cleared paddocks and land that has never been utilised by the licence holder. The soil type at this location is expected to be sandy gravel with low clay content similar to that of Plot A and B as they are directly adjacent.

This expansion of the irrigation area will be an improvement to the current WWTS and will be accompanied by the installation of three (3) new groundwater monitoring bores, an upgradient groundwater monitoring bore, new soil monitoring sites and a cut off drain along the southern boundary of Plot C as outlined in condition 2 of the amended licence.

### 3. Risk assessment

The table below describes the risk events associated with the amendments consistent with the *Guidance Statement: Risk Assessments* (DER 2017). The table identifies whether the risk events are acceptable and tolerated, or unacceptable and not tolerated, and the appropriate treatment and degree of regulatory control, where required.

Risk Event				Consequence rating <sup>1</sup>	Likelihood rating <sup>1</sup>	Risk <sup>1</sup>	Reasoning	Regulatory controls
Source/ Activities	Potential emissions	Potential receptors, pathway and impact	Licence holder controls					
PROPOSED AMENDMENT								
Expansion of the approved irrigation area (addition of Plot C).	Treated wastewater disposal via irrigation system on extended irrigation area (nutrient-rich wastewater).	<p>Potential to contaminate surrounding land and adversely impact upon surface water soil and groundwater.</p> <p>Overland runoff to Lennar Brook and on-site tributary, causing contamination of surface water systems.</p> <p>Pooling and subsequent infiltration to shallow groundwater, causing groundwater contamination (nutrients).</p>	<p>Continue to accurately monitor wastewater volumes and nutrient concentrations being irrigated and record irrigation and nutrient loading rates against licence limits.</p> <p>Avoid irrigation on waterlogged land or when rainfall is forecast.</p> <p>Complete ongoing soil, groundwater and surface water monitoring program to detect impacts to the environment.</p> <p>Maintain flow meter, pump and pipelines to prevent blockages, spills and leaks of wastewater.</p>	<p>Onsite impact: mid-level</p> <p>Offsite impact local scale: low-level</p> <p>Offsite impact wider scale: low-level</p> <p><b>Moderate</b></p>	<p>The risk event could occur at some time.</p> <p><b>Possible</b></p>	<p><b>Medium</b></p> <p>Acceptable, generally subject to regulatory controls</p>	<p>The discharge of treated wastewater to land is considered to pose a medium risk of impact to soil structure, surface water and groundwater quality given the elevated nutrient content in treated wastewater. The proposal to increase the size of existing irrigation area on the premises onto Plot C is, however, an improvement to current wastewater management practices.</p> <p>Existing controls on the licence are considered adequate for regulating the management of wastewater and irrigation practices on the premises. The Delegated Officer considers that Plot C is suitable for irrigation and that existing irrigation operational controls specified for Plot A and B are to be applied to Plot C to reduce the risk of impacts to receptors to an acceptable level.</p> <p>Existing irrigation controls to be applied to Plot C include preventing irrigation generated runoff, spray drift or discharge beyond the designated irrigation area, even distribution of treated wastewater over the irrigation area, avoiding irrigation on land that is flooded or waterlogged, ensuring vegetation cover is maintained and preventing soil erosion.</p> <p>Additional requirements have been added, including the installation of new monitoring bores and soil monitoring locations within Plot C. A cut-off drain will also be installed along the southern boundary of Plot C. These additional controls will act to decrease the risk of impact to sensitive receptors.</p>	<p>Existing premises operation conditions (conditions 1)</p> <p>Installation of new monitoring bores (condition 2 and 3)</p> <p>installation of new soil monitoring sites (condition 2 and 3)</p> <p>Installation of new cut of drain (condition 2 and 3)</p> <p>Existing waste and by-product storage and disposal conditions (condition 4)</p> <p>Existing disposal of treatment wastewater conditions (condition 5)</p> <p>Existing emissions to land loading limits conditions (condition 6)</p> <p>Existing monitoring of emissions to land conditions (condition 8)</p> <p>Additional monitoring bores in ambient environmental monitoring (condition 10)</p> <p>Additional soil sampling points in ambient environmental monitoring (conditions 11)</p> <p>Map of authorised irrigation areas added to reflect increased area.</p> <p>Map of additional groundwater monitoring bores added.</p>

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guidance Statement: Risk Assessments* (DER 2017).

## 4. Decision

The Delegated Officer has determined to amend Licence L6112/1996/11 as the proposal to increase the size of existing irrigation areas is unlikely to result in a change to the overall risk profile of the site. This determination is based on the following:

- The proposal does not involve an increase in production throughput, or the volume of wastewater being irrigated on the premises;
- No clearing is required for Plot C;
- Plot C is no closer to any sensitive receptors than Plot A and Plot B; and
- The increase in area is likely to result in improvements to current WWTS.

To address the potential impacts to surface water and groundwater that may result from the proposal, and to enable proactive management to protect downgradient surface water and groundwater receptors, the following controls have been added to the existing licence:

- The requirement to install downgradient and upgradient groundwater monitoring bores MW10R, MW14, MW15 and MW16;
- The requirement to add additional soil monitoring sides within Plot C; and
- The requirement to install a cut off drain along the southern boundary of Plot C.

The Delegated Officer has also elected to update condition 2 of the current licence as an administrative change. The Delegated Officer opted to remove the Hock and Tripe processing rooms from the works infrastructure of the existing licence, on the basis that the department has assessed the documents provided by the licence holder and determined that they meet the requirements of the works conditions of Licence L6112/1996/11.

Additionally, the Delegated Officer had made the decision to remove monitoring bores MW12, and MW13 from the works infrastructure under condition 2 of the existing licence. The Delegated Officer has chosen to remove MW12 and MW13 from condition 2 on the grounds that the licence holder provided bore logs for each bore and that irrigation will not be occurring on Plot A and Plot B for a period of time. A review of the construction, development and installation of groundwater monitoring bores MW12 and MW13 may be required prior to irrigation recommencing on Plot A and Plot B. The upgradient groundwater monitoring well MW10R was not removed from condition 2 as its installation did not occur and it is still necessary for providing background groundwater quality data.

## 5. Consultation

The licence holder was provided with a first draft of the revised licence and amendment report on 1 July 2025 and responded with no comments. A meeting was held with the licence holder on 9 July 2025 to discuss the drafts and the additional details that were required from the licence holder for the final instruments.

An extension was requested on 21 July 2025 to extend the 21 day comment period by 2 weeks to 4 August 2025. The design plan for the cut off drain was provided by the licence holder on 31 July 2025 and the Delegated Officer determined that the design plans would be added to the revised licence.

## 6. Conclusion

Based on this assessment, it has been determined to amend the existing licence, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

### 6.1 Summary of amendments

The below table provides a summary of the proposed amendments and will act as a record of

implemented changes. All proposed changes have been incorporated into the revised works approval as part of the amendment process.

<b>Condition no.</b>	<b>Proposed amendments</b>
<i>Licence history</i>	<i>Updated to include licence amendment to increase irrigation area and administrative amendment to remove previous works.</i>
<i>Condition 1 – Table 1 item 7</i>	<i>Site infrastructure and equipment modified to include additional irrigation area (Plot C), and area and number of sprinklers updated.</i>
<i>Condition 2 – Table 2</i>	<i>Condition amended to include the installation of new groundwater monitoring bores MW14, MW15 and MW16. Location and construction requirements specified.</i>
<i>Condition 2 – Table 3</i>	<i>Amendment of condition to include the installation of a cut off drain at the southern boundary of Plot C.</i>
	<i>Hock and Tripe processing rooms removed from condition as evidence of compliance was provided.</i>
	<i>Monitoring bores MW12 and MW13 removed from condition as evidence of compliance was provided.</i>
<i>Condition 4 – Table 4 item 10</i>	<i>Disposal strategy of treated wastewater edited to include Plot C.</i>
<i>Condition 5 – Table 5 item 1</i>	<i>Emissions points reference location amended to include Plot C and Figure corrected.</i>
<i>Condition 6 – Table 6</i>	<i>Emission point reference adjusted to include Plot C and Figure corrected.</i>
<i>Condition 8 – Table 8</i>	<i>Parameter for monitoring location FM1 edited to include Plot C.</i>
<i>Condition 10 – Table 10</i>	<i>Monitoring of new groundwater bores MW10R, MW14, MW15 and MW16 added (sampling to commence once installed).</i>
<i>Condition 11 – Table 11</i>	<i>Soil sampling location edited to include more up to date specifications and sampling method AS/NZS 4482.1 removed.</i>
<i>Condition 13</i>	<i>Condition updated to new format and amended to include DPIRD soil sampling guidelines.</i>
<i>Table 13: Definitions</i>	<i>Addition of term ‘DPIRD guidelines for soil sampling’.</i>
<i>Schedule 1: Maps</i>	<i>Maps updated to include new irrigation area and bore locations.</i>

## References

1. Department of Environment Regulation (DER) 2017, *Guidance Statement: Risk Assessments*, Perth, Western Australia.
2. Department of Water (DoW) 2010, *Water quality protection note 33: Nutrient and irrigation management plans*, Perth, Western Australia.
3. Department of Water and Environmental Regulation (DWER) 2019, *Guideline: Decision Making*, Perth, Western Australia
4. License amendment application form 17 April 2025