



Application for Licence

Part V Division 3 of the *Environmental Protection Act 1986*

Licence Number	L7437/2000/12
Applicant	Nufeds Pty Ltd
ACN	158 541 407
File Number	DER2014/000055-1
Premises	<p>Nufeds 26 Railway Parade WELSHPOOL, WA 6106</p> <p>Legal description Lot 1 on Plan 36629 and Part of Lot 2 on Plan 36628 Railway Parade WELSHPOOL WA 6106</p> <p>As defined by the Premises map and coordinates attached to the issued licence</p>
Date of Report	20/05/2021
Decision	Licence granted

Chris Malley
Manager, Process Industries

An officer delegated by the CEO under section 20 of the EP Act

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1. Scope of assessment

1.1 Application summary

On 6 July 2020 Nufeds Pty Ltd (licence holder) applied to renew the licence L7437/2000/11 as the licence is due to expire on 22 June 2021. The licence relates to category 23 for animal feed manufacturing and is located about 10 km south of Perth.

The main activities occurring on the premises include mixing and batching of animal feed into a “mash product” which is an animal feed for chickens. This is a dry mix process using hammermill, roller mill and mixer in an enclosed building. Dry raw materials are received in daily into two main dump sinks. The grain receival dump sink has a roller door fitted to one end which can be closed once the truck trailer is fully over the grid. Also, on the truck exiting end there are swinging plastic doors that can closed around the sides of the trucks to minimise dust emissions.

The protein meals dump sink is enclosed from three sides to prevent dust emissions. All animal feed mixers and mixing are undertaken in fully enclosed sheds. Discharges to air from the hammer mill are controlled with the use of cyclones for the removal of particulate matter in the airstream and the roller mill is equipped with a fully curtained dust collection bin. Final products are loaded out to customers daily.

The premises previously manufactured pelletised feed however this was discontinued in 2018. The licence holder has advised the department that the pellet press, crumbler, cooler and boiler have all been decommissioned.

No manufactured feed or chemicals/fuel are stored onsite. A road base/bitumen cover has been applied on the surface of the premises to prevent dust lift off from operation. Any solid waste products generated on-site are removed off-site

The department has determined to undertake an administrative renewal of the licence and has not conducted a full review and risk assessment of emissions and discharges from the premises in line with the Department’s *Work Instruction: Regulatory Services, COVID-19 licensing position* April 2020.

In replacing the licence, 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>.

2. Decision summary

The Delegated Officer has determined to grant the licence L7437/2000/12 without conducting any additional assessment or risk assessment. The Delegated Officer considered administrative changes only on the grounds of time constraints.

The renewed licence will be issued for 20 years period consistent with the *Guidance Statement on Licence Duration 2016*.

In renewing the licence the Delegated Officer has determined to:

- incorporate licence amendment issued 20 April 2020 into the replacement licence;
- update the format and appearance of the licence;
- remove redundant conditions and include conditions considered necessary for the effective administration of the licence (i.e. record keeping and reporting requirements);
- revise licence conditions and consolidated existing air pollution control conditions from infrastructure into one condition i.e. condition 1, *Table 1: infrastructure and*

- equipment requirements;*
- correct clerical mistakes and unintentional errors; and
- transfer all existing regulatory controls and conditions to the renewed licence.

As a result of this review, a revised draft Licence L7437/2000/12 will be issued for 20 years has been granted subject to conditions setting out in the attached licence.

2.1 Regulatory framework

In completing the licence renewal in this decision report, the department has considered and given due regard to its Regulatory Framework and relevant policy documents which are available at <https://www.der.wa.gov.au>.

2.2 Summary of administrative changes

Section 62 of the EP Act provides general power to impose conditions on works approval and licences. All works approvals and licences are issued with conditions as per *Guidance Statement – Setting Conditions* (October 2015) for the purposes of the EP Act to prevent, control, abate or mitigate pollution or environmental harm.

Table 1 sets the rationale for licence conditions review and amendment.

Table 1: Licence conditions amendment

Licence condition number	Previous licence condition	Rationale	New Licence condition number
G1	The licence holder must: (a) undertake an audit of their compliance with the conditions of this licence during the preceding annual period; and (b) prepare and submit to the CEO by no later than 30 days after the end of that annual period an Annual Audit Compliance Report in the approved form.	Conditions renumber and amended to current format.	Condition 3
G2	Nothing in this licence shall be taken to authorise any emission that is not mentioned in this licence, where the emission amounts to: (a) pollution; (b) unreasonable emission; (c) discharge of waste in circumstances likely to cause pollution; or (d) being contrary to any written law.	This condition is now redundant and has been removed from the licence.	Conditions removed from the licence
A1(a)	The Licence Holder shall operate the premises such that there is no visible dust crossing the boundary of the premises.	These conditions are now redundant. Dust control conditions are updated in the revised licence to ensure dust emissions are controlled from infrastructures and equipment that are used for the operation of feed manufacturing activity (the primary activity).	Conditions removed from the licence
A1 (b)	The Licence Holder shall apply and maintain a bitumen, coarse gravel or other dust suppressant road base cover, over the weighbridge, transfer area and other traffic areas to minimise the generation of visible airborne dust.		
A2(a)	The Licence Holder shall ensure that all loading and/or unloading areas are fitted with doors or other screen devices.	Conditions A2(a), A2(b), and A2(c) are now grouped into one condition in the condition 1.	Condition 1
A2(b)	The Licence Holder shall ensure that the doors or other screen devices referred to in part (a) of this condition are utilised when there is a potential for the generation of airborne dust.		
A2(c)	The Licence Holder shall ensure that any air discharges from the hammer mills are passed through dust collection equipment, such as cyclones, for removal of particulate matter prior to discharge to the environment.		
Condition A2(d)	The Licence Holder shall ensure that air discharged from the pellet cooler passes through a cyclone or other dust collection system, for the removal of particulate matter prior to being discharged into the environment.	Delegated Officer noted that the pellet press, crumbler, cooler and boiler were decommissioned in 2018 and are no longer in operation.	Condition removed from the licence
Condition W1	The Licence Holder shall discharge all wastewater generated on the premises to a dedicated soak well.	Condition W1 in the existing licence specified discharge of boiler and condenser wastewater through a dedicated soak well. The operation of boiler and condenser has ceased in 2018 and no longer in use.	Condition removed from the licence
W2(a),	The Licence Holder shall store environmentally hazardous chemicals including fuel, oil or other hydrocarbons (where the total volume of each product stored on the premises exceeds 250 litres) within low permeability (1×10^{-9} m/ or less) compound(s) designed to contain not less than 110% of the volume of the largest storage vessel or inter-connected system, and at least 25% of the total volume of products stored in the compound.	The Delegated Officer has noted that the premises does not store chemicals and determined to remove these conditions from the licence .	Conditions removed from the licence.
W2(b) and	The compound(s) described in part (a) to this condition shall: i) be graded or include a sump to allow recovery of liquid; ii) be chemically resistant to the products stored; iii) include valves, pumps and meters associated with transfer operations wherever practical. Otherwise valves and pipework associated with fuel delivery operations shall be protected against damage from vehicle impact and vandalism; iv) be designed such that jetting from any storage vessel or fitting will be captured within the bunded area [see for example Australian Standard 1940-2004 Section 5.9.]; v) be designed such that products which may react dangerously if they come into contact, are in separate bunds in the same compound or in different compounds; and vi) be controlled such that the capacity of the bund is maintained at all times (eg. regular inspection and pumping of trapped uncontaminated rain water).		
W2(c)	The Licence Holder shall immediately remove and dispose of any spills or leaks of chemicals including fuel, oil or other hydrocarbons, whether inside or outside the low permeability compound(s).		

2.3 Additional conditions

The licence has been amended to include standard conditions for recording complaints (condition 2) and keeping books (condition 4 and 5) in line with DWER's *Guidance Statement – Setting Conditions* 2015. These are standardised conditions for the effective administration of the licence.

3. Consultation

The draft revised replacement licence and this decision report were provided to the licence holder on 14 May 2021 for comment. The licence holder made a comment regarding the requirement for the dump sink for protein receival area to have a roller door to be fitted. The Delegated officer has considered this requirement and as the receival area is three sided and is deep enough to ensure there are no dust impacts from the receival of protein on the premises.

4. Conclusion

Based on the assessment in this Decision Report, the Delegated Officer has determined that the renewed licence L7437/2000/12 will be granted. The renewed licence is subject to conditions commensurate with the determined controls as well as necessary for administration and annual reporting requirements.