



Application for licence amendment

Division 3, Part V *Environmental Protection Act 1986*

Licence number L9364/2022/1

Licence holder Westpork Pty Ltd

Application number APP-0027541

Premises Westpork Moora 3 Piggery
898 Agaton Road
DANDARAGAN WA 6507

Date of report 24 June 2025

Status of report Final

Amendment description

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

This amendment was initiated by the licence holder and is limited to changing the location of the carcass disposal pit at the Moora 3 Piggery, in addition to other administrative updates and changes.

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

Purpose and scope of assessment

Westpork Pty Ltd (Westpork/licence holder) is seeking changes to its existing licence (L9364/2022/1) regarding the disposal location for mortalities.

Background

Westpork was issued L9364 for operation of the Moora 3 Piggery in March 2024 following the completion of construction.

As part of assessing the licence application, the department identified the location of the carcass disposal pit established during the construction phase (i.e., east of the pig sheds) to be different to the location proposed in the original works approval application, and that the new location was much lower in the landscape than the originally proposed site, with monitoring results indicating the seasonal high water table at less than 4 m bgl in the location.

Assuming the pits are excavated to a maximum depth of 3 – 4 m, there would be insufficient separation to the water table, which poses an unacceptable risk of groundwater impacts as the carcasses decompose.

An improvement condition was therefore imposed on L9364 that required Westpork to either investigate more suitable disposal sites on the premises, put forward a proposal to line the disposal pit with a low permeability liner, or propose an alternative method of managing mortalities, such as composting. A timeframe of three months was imposed, to ensure a timely cessation of the existing pit.

Westpork subsequently advised that it had identified a suitable alternative site, located on a sandy ridge about 100 m west of the pig sheds, with an estimated separation of at least 5 metres between the base of the pit and the highest known water table (ground level elevation 251 – 252 m AHD with the base of the pit 248 – 249 m AHD, and highest known water table recorded at monitoring well MW5 being 239 – 241 m AHD).

Proposed amendments

Westpork seeks amendments to L9364, to include the new carcass disposal pit as authorised infrastructure at the premises (Condition 1, Table 1); to delete improvement conditions 7, 8 & 9 relating to the existing carcass disposal pit, as these requirements have now been completed; and to add two new groundwater monitoring wells that have been constructed in the vicinity of the new disposal pit (MW 13 and MW14).

Additionally, Westpork seeks to have conditions 10, 11, 12 & 13 deleted, which relate to the construction of secondary containment around the central effluent sump, as compliance with these conditions have been met and closed out.

Westpork also seeks to delete the requirement in Table 1 for the settlement ponds to have a secondary liner, on the grounds the trenches are designed and have been constructed with a compacted clay liner (CCL) as the primary lining system and that a HDPE geomembrane liner

was initially installed as a precaution due to some areas of the CCL failing permeability testing and not being able to have the areas repaired at the time due to the clay being too wet to be worked. Westpork consider that when the trenches are desludged for the first time, the CCL will meet the required permeability, and a secondary (HDPE) liner will not be required.

Decision

New carcass disposal pit location

The department reviewed the information provided on the new location and whilst it appears there is suitable separation to groundwater at the new location, the soils in that area are very sandy (high permeability) and under local climatic conditions, it is likely that leachates from an unlined burial pit (which would have high biochemical oxygen demand and elevated ammonium ion concentrations) would still infiltrate down to the water table after a period of time, which could locally limit access to groundwater for various users into the future.

Given this, the department advised Westpork it would accept the short-term burial of carcasses in the new location for a period of time up to a maximum of five years, which will provide it with sufficient time to develop a more suitable method of managing mortalities, such as using a composting process, which is the preferred method under the *National Environmental Guidelines for Indoor Piggeries* (APL 2018).

As such, a ninth item has been added to Table 1, being the new carcass disposal pit, which requires the base of the pit to not exceed 3.0 m below the natural ground level. The map of infrastructure in Schedule 1 has also been updated to depict the new pit location and the previous pit has been removed.

Three new conditions (8, 9 & 10) have also been added, to require that mortalities are managed either by disposing within the carcass disposal pit or removed off-site to a premises that is authorised to accept that type of waste, such as a licensed rendering, composting or organics recycling facility, i.e., as a contingency measure (condition 8). An operational requirement has also been added to Table 2, item 7, which requires that where mortalities are disposed of on the premises, they must only be disposed of within the designated carcass disposal pit.

Disposal of carcasses within the old pit must cease by 1 July 2025, after which all carcasses must be disposed of within the new pit (condition 9). Additionally, Westpork must find a sustainable method of managing mortalities beyond 1 July 2030, such as using a composting process (condition 10).

Two new groundwater monitoring wells (denoted 'MW13' and 'MW14') were installed in January 2025, located up- and down- hydraulic gradient of the new pit – Westpork chose to install these bores in advance of this amendment, at its own risk. After reviewing the construction completion details and bore logs, the department is satisfied they have been appropriately located and constructed. The wells have therefore been added to the Schedule 1 map and the groundwater monitoring schedule (Table 5).

Conditions 7, 8 & 9 have therefore been deleted.

Deletion of conditions

Secondary containment

A concrete secondary containment bund was constructed around the central effluent sump in early July 2024, which meets the requirements of condition 10.

A compliance report was received by the department on 15 July 2024, which meets the requirements of condition 12. The report certified that the works had been completed in accordance with the requirements specified in condition 11.

The department reviewed the report and notified Westpork on 31 July 2024 that it was

satisfied the as-constructed bund met the requirements of condition 11, with the exception of the as-constructed capacity being two full sumps plus 16% (270 kL), instead of two full sumps plus 40%, as originally proposed and specified in condition 11. Westpork advised this was the result of the length of the area being constructed, in error, one metre shorter than originally proposed (27 m was constructed instead of 28 m), which resulted in the slightly reduced capacity. The department considered that as the as-constructed capacity still greatly exceeded the industry standard of 110%, this was acceptable and a minor deviation.

Conditions 10, 11, 12 & 13 have therefore been deleted.

A new clause, 3(c) has also been added to Table 1, to require the secondary containment be maintained with a minimum storage capacity of 270 kL.

Secondary liner on settlement trenches

The department notes that although the original design was for the trenches to be lined with only a CCL, Westpork went ahead and installed an additional HDPE liner as a precaution after the CCL failed the compaction tests in one top area – this was not assessed or approved by the department. As such, it was determined to include this infrastructure requirement on the licence on the basis of risk, in which it will serve a purpose until the trenches are desludged.

Westpork advise the HDPE liner is sacrificial and will likely be damaged and removed during the first solids removal event of each settlement trench, where the underlying CCL will then form a single lining system. The CCL may need to be partially replaced or repaired following removal of the solids, prior to being re-certified as being fit-for-purpose, and the trench put back into service.

To address this issue, clause 6(d) in Table 1 has been amended to reflect that the trenches must be maintained with a lining system that achieves a permeability of at least 1×10^{-9} m/s, as compacted clay, HDPE geomembrane, or similar lining system, to allow flexibility in the lining system that can be used.

Pond Solids Management Plan

Submission of a Pond Solids Management Plan was received by the department on 30 January 2025, which meets the requirements of condition 5.

The plan was initially imposed on the licence due to concerns about how dried solids could be mechanically removed from the trenches without damaging the underlying HDPE liner. As it is now known this liner is sacrificial and will likely be removed following the first solids removal event, it is no longer of concern.

Conditions 5 & 6 have therefore been deleted.

Other changes

In amending the licence, the delegated officer has also:

- revised condition numbers, and removed any redundant conditions and realigned condition numbers for numerical consistency; and
- corrected clerical mistakes and unintentional errors.

Consultation

The licence holder was provided with drafts of the amended licence and this report on 9 May 2025 and requested the amendment be issued with no further comment.

Conclusion

The delegated officer has determined to amend the existing licence, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

Summary of amendments

The below table provides a summary of the proposed updates and will act as a record of implemented changes. All proposed changes have been incorporated into the amended licence.

Condition / table	Description
Condition 1, Table 1	Clause 3(c) added to include new secondary containment requirements
	Clause 6(d) amended to update lining requirements for the settlement trenches
	Clause 9 added to include the new carcass disposal pit
Condition 2, Table 2	Clause 7(a) amended to update mortalities management requirements
Conditions 5 & 6	Deleted – submission of pond solids management plan
Conditions 7 – 9	Deleted – investigation into alternative carcass disposal locations
Conditions 10 – 13	Deleted – secondary containment around central effluent sump
New condition 8	New condition specifying how mortalities must be managed
New condition 9	New condition specifying cessation of original carcass disposal pit by 1 July 2025
New condition 10	New condition requiring submission of a plan for managing mortalities beyond July 2030
Condition 15, Table 5	Two new wells added to groundwater monitoring schedule
Condition 16, Table 6	Updated to require recording of disposal method for all mortalities
Definitions	Definitions deleted: 'books', 'prescribed premises'
Schedule 1: Maps	Map of infrastructure updated to include location of new carcass disposal pit and monitoring wells