



## Application for Works Approval

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

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**Works approval number** W3055/2025/1

**Works approval holder** Hillcroft Farms Pty Ltd

**Reference number** APP-0030432

**Premises** Hillcroft Farms  
1395 Yornaning Road  
LOL GRAY WA 6311

**Date of report** 15 December 2025

**Status of report** Final

# 1. Application details

On 3 August 2025 Hillcroft Farms Pty Ltd (applicant) submitted an application to the Department of Water and Environmental Regulation (the department) for a works approval at Hillcroft Farms (premises) under section 54 of the *Environmental Protection Act 1986* (EP Act). The application is for a proposed expansion of the existing piggery at the premises.

This report documents the department's assessment of potential risks to the environment and public health arising from the emissions and discharges during the construction and operation of the proposed expansion infrastructure at the premises. As a result of this assessment, works approval W3055/2025/1 has been granted.

The infrastructure and equipment relating to the premises categories and any associated activities which the department has considered in line with Guideline: Risk Assessments (DWER 2020) are outlined in works approval W3055/2025/1.

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 <https://dwer.wa.gov.au/regulatory-documents>.

## 1.1 Background

The applicant currently operates an existing intensive piggery at the premises under licence L8812/2014/2 which comprises a conventional indoor farrow-to-finish piggery with an assessed design capacity of 16,170 animals, or 15,912 standard pig units (SPUs).

The piggery was established in 1982 and is located at 1395 Yornaning Road, Lol Gray.

The applicant also operates a feed mill on the premises, using grain harvested from the premises, to supply about 180 tonnes of feed per week for the piggery.

Water used in the piggery is primarily for drinking, cleaning, and cooling. The main water source for the piggery is a large dam (approximately 38,000 m<sup>3</sup>) located southeast of the premises on land owned by the applicant. Additionally, groundwater from three production bores on the premises is treated through an onsite desalination unit.

The pigs are housed in conventional indoor sheds with concrete under-floor effluent channels that collect manure, waste feed and water. These channels direct this effluent to the wastewater treatment system (WWTS) via a pull plug system that is flushed once about every 8 weeks. Pigs are typically weaned at 4 weeks of age and transferred into deep litter shelters on the premises until they reach 12 weeks of age. Used bedding is removed and stored or composted behind the shelters with each new batch of pigs. Mortalities are removed from the sheds daily and buried in a pit at the southern end of the premises.

At current capacity, about 34.19 ML/yr of effluent is generated from operations, which is directed to the WWTS via underground PVC pipes. Effluent includes wash down water, contaminated run-off, conventional shed flushing water, desalination plant wastewater, and drinking water wastage.

The WWTS comprises an initial collection tank, screw press solids separator, clean water tank and five effluent ponds – three anaerobic ponds and two evaporation ponds – with a combined storage capacity of about 67 ML. All effluent is managed via evaporation on the premises (i.e., no on-site disposal).

## 1.2 Proposed works

The applicant has proposed works at the premises relating to:

- (a) the construction of 9 new conventional sheds;
- (b) the construction of a new 37.3 ML covered anaerobic pond (CAP) and a new 27.2 ML evaporation pond; and
- (c) the decommissioning of 5 existing conventional sheds.

The proposed works will essentially double the design capacity of the premises, from 15,912 SPU to 33,225 SPU.

The proposed expansion will allow all breeders, weaners and finishers to be housed in the conventional sheds, with the growers from 12-17 weeks housed in the deep litter shelters.

At the expanded capacity, it is estimated that 42.9 ML of wastewater will be generated; the addition of the proposed CAP and a new evaporation pond will account for this increase in influent. The proposed additions are intended to ensure the pond system remains sufficiently sized to manage all effluent at the expanded capacity, without the need for any on-site disposal.

The proposed new infrastructure will be constructed within the existing prescribed premises boundary, with no change to the existing distance from identified sensitive receptors.

The applicant has also proposed an increase in the throughput of the feed mill to 20,000 tonnes per annual period; no additional works are required as the existing infrastructure has the capacity to support this increase.

## 2. Location and siting

### 2.1 Siting context

The premises is located in the Wheatbelt region about 12 km north-east of the rural locality of Yornaning. The premises is about 100 ha in size and is zoned rural under the Shire of Cuballing local town planning scheme. The existing piggery operation has been approved by the Shire under the land use "Animal Husbandry – Intensive".

The surrounding land to the north and east of the piggery is predominantly used for sheep and cropping, most of which is owned by the applicant. The Lol Gray State Forest is directly adjacent to the southern and western boundaries of the premises.

### 2.2 Residential and sensitive receptors

The distances to sensitive receptors are detailed in Table 1.

**Table 1: Receptors and distance from activity boundary**

Sensitive Land Uses	Distance from Prescribed Activity
Rural dwelling (legal house)	The closest rural dwellings (not owned by the applicant) are situated about 1.6 km south-east, 2.7 km south-east, 3.6 km west and 4 km north-west of the premises.

### 2.3 Specified ecosystems

Specified ecosystems are areas of high conservation value and special significance that may be impacted as a result of activities at or emissions and discharges from the premises. The distances to specified ecosystems are shown in Table 2. Table 2 also identifies the distances to other relevant ecosystem values which do not fit the definition of a specified ecosystem.

The table has also been modified to align with the *Guideline: Environmental Siting*.

**Table 2: Environmental values**

Specified ecosystems	Distance from the Premises
DBCA managed lands	The Dryandra Woodland National Park under the CALM Act 1984 is located 832 m north, 1.5 km southeast, 1.5 km southwest and 5km west of the premises boundary. The majority of this park is also classified as critically endangered, priority 3, Eucalypt Woodlands of the Western Australian Wheatbelt.  The premises is immediately adjacent to the Lol Gray State Forest

	under the CALM Act 1984 on its southern and western borders. The Monague State Forest under the CALM Act 1984 is also situated 2.4 km south-east of the premises.
Threatened Ecological Communities (TEC)	Several mapped occurrences of the Priority 3 critically endangered 'Eucalypt woodlands of the Western Australian Wheatbelt' are situated on the boundaries of the premises. Two occurrences of these communities are also situated within the borders of the premises. The new sheds are approximately 334 m northwest of the closest community, the proposed evaporation pond is approximately 200 m north of the closets community, and the proposed CAP is approximately 400 m west of the closest community.  The above TEC is also listed as a 'Critically Endangered' Threatened Ecological Community under the Federal Environment Protection and Biodiversity Conservation Act 1999.
Threatened and Priority Flora	<i>Darwinia carnea</i> was identified 1.7 km northeast of premises boundary.  <i>Banksia subpinnatifida</i> var. <i>subpinnatifida</i> was identified 1.4 km west of premises boundary.

## 2.4 Groundwater and water sources

The distances to groundwater and water sources are shown in Table 3.

**Table 3: Groundwater and water sources**

Groundwater and water sources	Distance from Premises
Surface Water	Hotham River is situated approximately 11.8 kilometres east and approximately 12.3 kilometres northwest of the premises, respectively. A minor tributary to Hotham River also flows approximately 568 m north of the premises boundary.  The Fourteen Mile Brook is situated approximately 3.4 km south of the premises with a minor tributary to Fourteen Mile Brook flowing approximately 588 m southeast of the premises boundary.  The premises is also located in the Murray River system surface water area proclaimed under the RIWI Act.
Groundwater	Depth to groundwater at the premises is approximately 20-60 m below ground level. The groundwater is brackish with total dissolved solids of between 2,000 and 3,000ppm.  No registered groundwater bores are located within 10 kilometres of the premises, based on a review of available DWER databases, however, two extraction bores are located on the premises.

## 2.5 Soil type

Department of Primary Industries and Regional Development (DPIRD) has classified the area in which the premises is located as soil system, Dryandra, with deep sandy duplex, loamy duplex and brown loamy earth. The premises more specifically comprise of two soil types with majority of the premises classified as gravelly sand, duplex yellow soil and duricrust, with the remainder yellow/brown deep sand duplexes and loams.

The existing wastewater treatment ponds on the premises are clay-lined using in-situ soil with a compacted base to meet the industry standards for liner permeability of  $1 \times 10^{-9}$  m/s.

## 2.6 Climate

The Narrogin Station (010614) is about 23 km from the premises and is the closest station

with long term climate statistics in the area.

The Narrogin area experiences a Mediterranean climate consisting of hot dry summers and wet winters with an annual mean rainfall of 442.3 mm from the years 1991 to 2020, with the heaviest rainfall occurring during the winter months from June to August (Bureau of Meteorology (BOM), 2025). Narrogin also has an annual mean minimum and maximum temperature of 5.2 °C and 31.3 °C respectively.

Evaporation data was derived from the BOM for the Narrogin Station (#010614) and indicated that rainfall exceeds evaporation from June to August, while evaporation exceeds rainfall from September to May each year.

### 3. Consultation

The application was referred to relevant public authorities and advertised for public comment on the department's website during September 2025. No public submissions were received in the timeframe specified.

#### Public authorities

The Shire of Cuballing is yet to confirm it has granted development approval for the expansion proposal; however, it is noted the application was heard at the October council meeting, with the officer's recommendation that council approve the development, subject to conditions.

The Department of Primary Industries and Regional Development provided comments on the sizing of the ponds and water balance and suggested that any proposal to apply pond sludge or irrigate treated effluent should be subject to a detailed nutrient management plan.

The Department of Biodiversity, Conservation and Attractions raised concerns about the potential for feral cat invasion into the adjacent State Forest.

### 4. Risk assessment

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guideline: Risk Assessments* (DWER 2020).

To establish a risk event there must be an emission, a receptor which may be exposed to that emission through an identified actual or likely pathway, and a potential adverse effect to the receptor from exposure to that emission.

#### 4.1 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for each identified emission source and takes into account potential source-pathway and receptor linkages. Where linkages are in-complete they have not been considered further in the risk assessment.

Where the applicant has proposed mitigation measures/controls, these have been considered when determining the final risk rating. Where the Delegated Officer considers the applicant's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the works approval as regulatory controls.

Additional regulatory controls may be imposed where the applicant's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 4.



**Table 4: Risk assessment of potential emissions and discharges from the premises during construction and operation.**

Risk Event				Consequence rating <sup>1</sup>	Likelihood rating <sup>1</sup>	Risk <sup>1</sup>	Reasoning	Regulatory controls
Activities	Potential emissions	Potential pathways, impact and receptors	Applicant controls					
Construction								
Construction of 9 new piggery sheds, decommissioning of 5 old piggery sheds.  Construction of a new covered anaerobic pond (CAP) and a new evaporation pond.	Dust	Unreasonable interference with the health, welfare, convenience, comfort, or amenity of sensitive rural residence not owned by license holder.	Construction is to occur within existing prescribed premises boundary, maintaining the existing distance to sensitive receptors.  Premises meets S-factor distances in NEGIP (2025) i.e. the premises will be compliant with the required separation distance of 1.33 km from the nearest legal dwelling, 1.74 km from nearest rural residential and 3.90 km from the nearest township for odour which is the main amenity concern with the largest required separation distance.  Weather is taken into consideration when undertaking activities which may produce excessive dust.	Minimal impacts to amenity <b>Slight</b>	The risk event will probably not occur in most circumstances <b>Unlikely</b>	<b>Low</b> Acceptable, based on applicant controls being implemented	The Delegated Officer considers there is sufficient separation distance from sensitive receptors (>1.6km from nearest sensitive residence), and therefore, does not reasonably foresee that noise and dust from construction works will impact on the amenity or health of off-site human receptors.	<u>Works approval controls:</u> Nil.
	Noise							
Operation								
Operation of 9 new indoor conventional piggery sheds - associated Increase in transport of pigs and feed - effluent collection and conveyance from new sheds	Noise	Unreasonable interference with the health, welfare, convenience, comfort, or amenity of sensitive rural residence not owned by license holder.	Premises is located >1.6km from nearest sensitive residence and is surrounded by dense vegetation on two sides.  New sheds to be constructed within the same footprint of the current piggery.  Premises operation between 6am and 6pm.  Regular inspections and maintenance of vehicles and equipment in accordance with manufacturer's recommendations will occur.	Low level impact to amenity <b>Minor</b>	The risk event could occur at some time <b>Possible</b>	<b>Medium</b> Acceptable, subject to regulatory controls	It is expected that with the proposed increase in pig numbers at the premises, there will be an increased noise emissions from pigs, transport, and machinery operations.  Given that the premises is located greater than 1.5km from nearby residences with significant vegetation maintained and that no noise complaints have been received from the existing operations, the Delegated Officer has determined there will be minimal noise impacts to nearby receptors.	<u>Works approval controls:</u> Nil.
	Odour		The premises meets S-factor distances in NEGIP (2025) for the nearest legal dwelling, nearest rural residential and nearest township.  The sheds are regularly inspected and cleaned to maintain clean lanes, pens and handling areas.  Static pits are monitored and emptied regularly to clean sheds.  The conveyance infrastructure to the ponds is fully enclosed underground and within the bank structure and not at height which minimises odour aerosols.  Mortalities are collected within 24hrs of discovery and placed in the burial pits.	Mid level impact to amenity <b>Moderate</b>	The risk event could occur at some time <b>Possible</b>	<b>Medium</b> Acceptable, subject to regulatory controls	It is expected that with the proposed increase in stock numbers at the premises, there will be an increased odour emissions.  Given that the premises meets the S-factors distance in NEGIP (2025), is surrounded by vegetation and that no odour complaints have been received from the existing operations, the Delegated Officer has determined that with the appropriate controls there will be minimal odour impacts to nearby receptors.	<u>Works approval controls:</u> Condition 1: states the design and construction requirements for the sheds.  Condition 10: outlines the operational requirements for the sheds.  Condition 11: specify that any complaints received by the works approval holder must be investigated and reported to the department.  Standard works approval construction, compliance and reporting conditions will apply.
	Nutrient rich wastewater spills/leaks	Seepage through the soil profile, or overland flow, contaminating soil, groundwater or surface water (Intermittent stream approximately 588 m southeast and 568 m north of the premises.), potentially adversely affecting critically endangered native vegetation of the Dryandra woodland national park and lol gray state forest.	New effluent system to be designed in accordance with the NEGIP (2025), which is the same as the current operation.  Sheds are built above the natural ground level to prevent in ingress of stormwater and egress of contaminated stormwater.  The sheds are monitored daily for effluent collection volumes and emptied regularly to prevent excessive build up.  The effluent collection system is regularly inspected for damage and is regularly flushed to prevent blockages.  All effluent collection systems under the piggery are impermeable concrete preventing groundwater contamination.  Pits are emptied in series on different days to minimise conveyance system overloading and overflow.	Mid-level onsite impacts and low level offsite impacts <b>Moderate</b>	The risk event will probably not occur in most circumstances <b>Unlikely</b>	<b>Medium</b> Acceptable, subject to regulatory controls	As the proposed effluent collection and transport systems for the new sheds are to be designed the same as that currently operated on the premises and in accordance with the NEGIP (2025) the Delegated Officer has determined that with the appropriate controls there will not be a significant increase in the risk of wastewater spills/leaks from the operation of the new sheds.  Additionally, there are no waterways located on the premises and groundwater depths are more than 20m below the sheds.	<u>Works approval controls:</u> Condition 1: states the design and construction requirements for the sheds.  Condition 10: outlines the operational requirements for the sheds.  Standard works approval construction, compliance and reporting conditions will apply.
Effluent treatment and storage in new covered anaerobic pond (CAP)	Odour including uncontrolled discharge of hazardous gas	Unreasonable interference with the health, welfare, convenience, comfort, or amenity of sensitive rural residence not owned by license holder.	The premises meets S-factor distances in NEGIP (2025) for the nearest legal dwelling, nearest rural residential and nearest township.  The proposed CAP will have an impervious cover.  Effluent ponds have been designed in accordance with APL National Environmental Guidelines and have sufficient treatment capacity to reduce	Minimal impacts to amenity <b>Slight</b>	The risk event will probably not occur in most circumstances <b>Unlikely</b>	<b>Low</b> Acceptable, based on applicant controls being implemented	The installation of CAP instead of traditional anaerobic ponds will reduce odour from solid waste. The CAP is covered and, therefore, it is unlikely odour will affect nearby receptors. In the case of a rare circumstance, it is possible that odourous gases may leak from the CAP's cover. Therefore, the Delegated Officer has implemented controls to ensure the cover is air tight.	<u>Works approval controls:</u> Condition 2: states the design and construction requirements for the CAP.  Condition 10: outlines the operational requirements for the CAP.  Condition 11: specify that any

Risk Event				Consequence rating <sup>1</sup>	Likelihood rating <sup>1</sup>	Risk <sup>1</sup>	Reasoning	Regulatory controls
Activities	Potential emissions	Potential pathways, impact and receptors	Applicant controls					
			volatile solids and produce a stabilised sludge which minimises odour. Scheduled site inspection and audits are to continue weekly.					complaints received by the works approval holder must be investigated and reported to the department. Standard works approval construction, compliance and reporting conditions will apply.
	Spills, leaks, and overtopping of leachate contaminated waste	Seepage through the hardstand causing vertical infiltration and contamination of groundwater and soil. Overland runoff to minor tributary to Fourteen Mile Brook and other surface waters within the Murray River system surface water area. Contamination of soil, groundwater and surface waters.	The CAP is designed such that it is adequate for the capacity of wastewater produced by the premises. Effluent ponds designed in general accordance with APL (2018), and in accordance with the NEGIP (2025) i.e. less than 1:20 year spill frequency for evaporation. Base of each CAP is lined with compacted natural clay, in accordance with the NEGIP (2025). CAP bases will be greater than 2m above the highest seasonal groundwater levels (>20m). All ponds have been designed with overflow piping at 500mm to maintain a freeboard in accordance with APL 2010- 2025 at all times. Ponds banks are raised above natural ground levels preventing excess stormwater from entering and impacting capacity. Scheduled site inspection and audits are to continue weekly monitoring of pond levels and review weather forecasts for intense rainfall events.	Mid level on-site impacts and low level off-site impacts <b>Moderate</b>	The risk event could occur at some time <b>Possible</b>	<b>Medium</b> Acceptable, subject to regulatory controls	With the increase in stock there is expected to be 42.9ML of effluent discharged to the primary pond. With the additional CAP and evaporation pond there is expected to be a maximum storage capacity of approximately 130.8ML for the WWTS. Therefore, the construction and operation of the CAP accounts for the additional wastewater production as a result of the increase in stock numbers. The CAP's liner will be constructed with less than 1x10 <sup>-9</sup> permeability to ensure adequate separation from groundwater, reducing the likelihood of groundwater contamination. The premises large separation distance to groundwater (20 – 60 m) provides the Delegated Officer confidence that it is not likely that leachate from infiltration/soil contamination will cause harm to the environment. The design of the CAP is sufficient to ensure it functions to prevent the likelihood of spills and overtopping wastewater. Therefore, Delegated Officer considers that with the appropriate controls the CAP can be maintained at an acceptable level of risk to mitigate environmental and public health risks.	<u>Works approval controls:</u> Condition 2: states the design and construction requirements for the CAP. Condition 10: outlines the operational requirements for the CAP. Standard works approval construction, compliance and reporting conditions will apply.
Generation, collection and treatment of biogas and flaring	Odour associated with hazardous gas	Unreasonable interference with the health, welfare, convenience, comfort, or amenity of sensitive rural residence not owned by license holder	The premises meets S-factor distances in NEGIP (2025) for the nearest legal dwelling, nearest rural residential and nearest township.	Low level impact to amenity <b>Minor</b>	The risk event may only occur in exceptional circumstances <b>Rare</b>	<b>Low</b> Acceptable, based on applicant controls being implemented	Biogas flaring works to safely dispose of biogas produced during the operation of the CAP. Flaring is used to minimise greenhouse gas emissions by converting methane into carbon dioxide. By flaring biogas odour and fugitive air emissions are reduced and it is expected that there will be minimal impacts on nearby receptors. The Delegated Officer considers that there is sufficient separation (>1.5 km to nearest rural dwelling) from the premises to nearby receptors. As a result, it is unlikely that odour and noise from the operation of flare will significantly impact on the amenity or health of off-site receptors.	<u>Works approval controls:</u> Condition 2: states the design and construction requirements. Condition 10: outlines the operational requirements. Condition 11: specify that any complaints received by the works approval holder must be investigated and reported to the department. Standard works approval construction, compliance and reporting conditions will apply.
	Noise from flaring of gas							
Effluent treatment and storage in new evaporation ponds	Odour	Unreasonable interference with the health, welfare, convenience, comfort, or amenity of sensitive rural residence not owned by license holder.	Effluent ponds have been designed in accordance with APL National Environmental Guidelines and have sufficient treatment capacity to reduce volatile solids and produce a stabilised sludge which minimises odour. Scheduled site inspection and audits are to continue weekly monitoring pond levels. All ponds have been designed with overflow piping at 500 mm to maintain a freeboard in accordance with APL 2010- 2025 at all times. There will be no irrigation of wastewater. The premises meets S-factor distances in NEGIP (2025) for the nearest legal dwelling, nearest rural residential and nearest township.	Low level impact to amenity <b>Minor</b>	The risk event will probably not occur in most circumstances <b>Unlikely</b>	<b>Medium</b> Acceptable, subject to regulatory controls	The new evaporation pond will result in a greater amount of wastewater held and is expected to result in an increased amount of odour. However, the applicant implementing their proposed controls to ensure regular inspections of the WWTS and that the ponds maintain their minimum freeboard, will ensure it is unlikely odour will significantly impact receptors. Given that the premises meets the S-factors distance in NEGIP-SD (2025), is surrounded by vegetation and no odour complaints have been received from the existing operations, the Delegated Officer has determined that with the appropriate controls there will be minimal odour impacts to nearby receptors.	<u>Works approval controls:</u> Condition 2: states the design and construction requirements for the evaporation pond. Condition 10: outlines the operational requirements for the evaporation pond. Condition 11: specify that any complaints received by the works approval holder must be investigated and reported to the department. Standard works approval construction, compliance and reporting conditions will apply.
	Spills, and leaks of nutrient rich wastewater	Overtopping caused by excess wastewater or stormwater causing seepage through the soil profile, or overland flow, contaminating soil or surface water offsite. Seepage through the hardstand causing vertical infiltration and contamination of soil and groundwater.	Effluent ponds designed in general accordance with APL (2018), and in accordance with the NEGIP i.e. less than 1:20 year spill frequency for evaporation. Base of the pond is lined with compacted natural clay, in accordance with the NEGIP (2025). Pond bases will be greater than 2m above the highest seasonal groundwater levels (>20m). All ponds have been designed with overflow piping at 500mm to maintain a freeboard in accordance with APL 2010-, 2025 at all times. Ponds banks are raised above natural ground	Mid level on-site impacts and low level off-site impacts <b>Moderate</b>	The risk event could occur at some time <b>Possible</b>	<b>Medium</b> Acceptable, subject to regulatory controls	With the increase in pig numbers there is expected to be 42.9ML of effluent discharged to the primary pond. With the additional CAP and evaporation pond there is expected to be a maximum storage capacity of approximately 130.8ML for the WWTS. Therefore, the construction and operation of the evaporation pond accounts for the additional wastewater production as a result of the increase in stock numbers. The pond liner will be constructed to ensure less than 1x10 <sup>-9</sup> permeability to ensure adequate separation between the pond and groundwater, reducing the likelihood of groundwater contamination. The premises large separation distance to groundwater	<u>Works approval controls:</u> Condition 2: states the design and construction requirements for the evaporation pond. Condition 10: outlines the operational requirements for the evaporation pond. Standard works approval construction, compliance and reporting conditions will apply.

Risk Event				Consequence rating <sup>1</sup>	Likelihood rating <sup>1</sup>	Risk <sup>1</sup>	Reasoning	Regulatory controls
Activities	Potential emissions	Potential pathways, impact and receptors	Applicant controls					
			<p>levels preventing excess stormwater from entering and impacting capacity.</p> <p>Scheduled site inspection and audits are to continue weekly monitoring of pond levels and review weather forecasts for intense rainfall events.</p>				<p>(20 – 60 m) reduces the likelihood that leachate from infiltration/soil contamination will cause harm to the environment.</p> <p>Given this information the Delegated Officer considers that with sufficient controls in place the new pond will unlikely impact nearby environmental receptors.</p>	
Increased operation of the feed mill	Noise	Unreasonable interference with the health, welfare, convenience, comfort, or amenity of sensitive rural residence not owned by license holder.	<p>The current design and management of the feed mill as an enclosed system along with large separation distances will ensure no additional emissions from the system impact on the surrounding environment.</p> <p>The premises meets S-factor distances in NEGIP (2025) for the nearest legal dwelling, nearest rural residential and nearest township.</p> <p>Piggery complex located &gt;1.6km from nearest receptors and is surrounded by dense vegetation on two sides.</p>	Minimal impacts to amenity <b>Slight</b>	The risk event will probably not occur in most circumstances <b>Unlikely</b>	<b>Low</b> Acceptable, based on applicant controls being implemented	The feed mills has manufacturing capabilities to increase production, therefore, no additional works are required. As there is no change in the existing design or management of the feed mill the Delegated Officer considers there to be low risk of impact on the amenity or health of off-site human receptors	<u>Works approval controls:</u> Nil.
	Dust							

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guideline: Risk Assessments* (DWER 2020).



## 5. Decision

The delegated officer has determined the proposal to construct additional piggery sheds and wastewater treatment infrastructure at the premises, to facilitate an increase in the assessed capacity, does not pose an unacceptable risk of impacts to on- and off-site receptors. This determination is based on the following:

- the expansion is located within the existing prescribed premises boundary, with the new infrastructure located no closer to any sensitive receptors than that already on the premises;
- a CAP and an additional evaporation storage pond will accommodate for the increase in wastewater generated, with water balance modelling indicating the new infrastructure is capable of managing the expected volumes of effluent that will be generated, with evaporation only (no irrigation);
- the construction of a CAP is considered industry best practice and is expected to result in a significant reduction in the amount of pond solids generated from operations at the premises, in addition to reducing the risk of off-site odour impacts from operations at the premises;
- the CAP and additional evaporation pond will have a storage capacity of 37.3ML and 27.2ML respectively, to maintain a less than 1 in 10 yr spill frequency;
- the construction and operation of the 9 conventional piggery shed is not expected to change the risk profile of the premises as they will be operated under industry best practice the same as the existing conventional shed on the premises;
- no works are required to increase the production of the on-site feed mill; and
- no complaints regarding the operation of the premises have been received by the department.

With the proposed new conventional sheds and wastewater treatment infrastructure in place, the delegated officer is satisfied the applicant will be capable of managing the volumes of waste that will be generated at an assessed capacity of 33,225 SPU. The delegated officer considers the design and construction standards of the proposed infrastructure are acceptable and essential for managing environmental risks. Therefore, these standards will be included in the works approval as infrastructure controls.

Works approval W3055/2025/1 that accompanies this decision report authorises the construction of the proposed new sheds and wastewater management infrastructure only. The conditions in the issued works approval, as outlined in Table 4 have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

Works approval W3055/2025/1 authorises construction and time-limited operations. However, an amendment to licence L8812/2014/2 is required following the time-limited operational phase authorised under the works approval to authorise emissions associated with the ongoing operation of the premises. A risk assessment for the operational phase has been included in this decision report, however, licence conditions will not be finalised until the department assesses the licence application. The licence will also require amendment to authorise the increase in the assessed capacity of Category 2 to 32,460 animals or 33,225 SPU and Category 23 to 20,000 tonnes per annual period.

It is noted that if the licence holder intends to irrigate effluent and/or spread pond sludge on to land, this will require further assessment and approval, subject to a detailed nutrient management plan.

## 6. Consultation

The applicant was provided with drafts of this report and the works approval on 3 December 2025 and sought only minor comments and clarifications.

## 7. Conclusion

Based on the assessment in this report, the delegated officer has determined that a works approval will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

## References

1. Australian Pork Limited 2015, *Code of Practice for On-farm Biogas Production and Use (Piggeries)*.
2. Australian Pork Limited 2015, *Piggery Manure and Effluent Management and Reuse Guide*.
3. Australian Pork Limited 2025, *National Environmental Guidelines for Indoor Piggeries (NEGIP): Siting and Design*, Kingston, Australian Capital Territory.
4. Bureau of Meteorology (BOM) 2025, *Climate statistics for Australian locations: Summary statistics NARROGIN*.
5. Department of Environment Regulation (DER) 2017, *Guidance Statement: Risk Assessments*, Perth, Western Australia.
6. Department of Water and Environmental Regulation (DWER) 2019, *Guideline: Decision Making*, Perth, Western Australia.
7. Department of Water and Environmental Regulation (DWER) 2019, *Guideline: Industry Regulation Guide to Licensing*, Perth, Western Australia.
8. Department of Water and Environmental Regulation (DWER) 2018, *Industry Regulation fact sheet: Intensive Piggery*, Perth, Western Australia.
9. Hillcroft Farms Pty Ltd 2025, *Works Approval Application Form*, 3 August 2025.
10. Shire of Cuballing 2019, *Shire of Caballing Local Planning Strategy*.