



Licence

Environmental Protection Act 1986, Part V

Licensee: **GD Pork Pty Ltd**

Licence: **L9142/2018/1**

Registered Office: G D Pork Pty Ltd
Level 3, 35 Outram Street
WEST PERTH WA 6005

ACN: 126 978 685

Premises Address: G D Pork Pty Ltd
502 Sutters Lane
WEST PINJARRA WA 6208

Being Lot 502 on Plan 54832
Certificate of Title Volume 2677 Folio 599
as depicted in Schedule 1.

Issue Date: Tuesday, 3 July 2018

Commencement Date: Tuesday, 3 July 2018

Expiry Date: Thursday, 27 September 2018

Prescribed Premises Category

Schedule 1 of the *Environmental Protection Regulations 1987*

Category number	Category description	Category production or design capacity	Premises production or design capacity
2	Intensive Piggery: premises on which pigs are fed, watered and housed in pens.	1000 animals or more	3121 Standard Pig Units (SPU)

Conditions of Licence

Subject to the conditions of licence set out in the attached pages.

Date signed: 3 July 2018

.....
Paul Byrnes
Manager, Licensing (Process Industries)

Officer delegated under Section 20



Licence conditions

1 General

1.1 Interpretation

1.1.1 In the Licence, definitions from the *Environmental Protection Act 1986* apply unless the contrary intention appears.

1.1.2 In the Licence, unless the contrary intention appears:

“**the Act**” means the *Environmental Protection Act 1986*;

“**annual period**” means the inclusive period from 1 July until 30 June in the following year;

“**AS/NZS 5667.1**” means the Australian Standard AS/NZS 5667.1 Water Quality – Sampling – Guidance on the design of sampling programs, sampling techniques and the preservation and handling of samples;

“**AS/NZS 5667.11**” means the Australian Standard AS/NZS 5667.11 Water Quality – Sampling – Guidance on sampling of groundwaters;

“**carcasses**” means the dead bodies of animals (pigs);

“**CEO**” means Chief Executive Officer of the Department of Environment Regulation;

“**CEO**” for the purposes of correspondence means:

Department Administering the *Environmental Protection Act 1986*
Locked Bag 33
CLOISTERS SQUARE WA 6850
Email: info@dwer.wa.gov.au;

“**environmentally hazardous material**” means material (either solid or liquid raw materials, materials in the process of manufacture, manufactured products, products used in the manufacturing process, by-products and waste) which if discharged into the environment from or within the premises may cause pollution or environmental harm. Note: Environmentally hazardous materials include dangerous goods where they are stored in quantities below placard quantities. The storage of dangerous goods above placard quantities is regulated by the Department of Mines and Petroleum;

“**fugitive emissions**” means all emissions not arising from point sources;

“**Licence**” means this Licence numbered L7286/1998/10 and issued under the *Environmental Protection Act 1986*;

“**Licensee**” means the person or organisation named as Licensee on page 1 of the Licence;

“**NATA**” means the National Association of Testing Authorities, Australia;



“NATA accredited” means in relation to the analysis of a sample that the laboratory is NATA accredited for the specified analysis at the time of the analysis;

“Premises” means the area defined in the Premises Map in Schedule 1 and listed as the Premises address on page 1 of the Licence;

“spot sample” means a discrete sample representative at the time and place at which the sample is taken;

“SPU” means a Standard Pig Unit (SPU) as defined in the current version of the National Environmental Guidelines for Piggeries;

“Schedule 1” means Schedule 1 of this Licence unless otherwise stated;

“Schedule 2” means Schedule 2 of this Licence unless otherwise stated; and

“µS/cm” means microsiemens per centimetre.

1.1.3 Any reference to an Australian or other standard in the Licence means the relevant parts of the current version of that standard.

1.1.4 Nothing in the Licence shall be taken to authorise any emission that is not mentioned in the 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.

1.2 General conditions

1.2.1 The Licensee shall maintain all pollution control and monitoring equipment to the manufacturer's specification or any internal management system.

1.2.2 The Licensee shall immediately recover, or remove and dispose of spills of environmentally hazardous materials outside an engineered containment system.

1.3 Premises operation

1.3.1 The Licensee shall ensure that all wastewaters from piggery operations including wash down water, by-products wastewater and contaminated run-off are directed to a wastewater treatment system.

1.3.2 The Licensee shall ensure that wastewater is only stored and/or treated within vessels or compounds provided with the infrastructure detailed in Table 1.3.2.

Table 1.3.2: Containment infrastructure

Storage vessel or compound	Material	Infrastructure requirements
Primary Anaerobic pond	Wastewater	None specified
Secondary Evaporation pond		
Emergency pond		



- 1.3.3 The Licensee shall manage the wastewater treatment ponds such that:
- (a) a minimum top of embankment freeboard of 500mm is maintained;
 - (b) storm water runoff is prevented from causing the erosion of outer pond embankments;
 - (c) overtopping of the wastewater treatment ponds does not occur except as a result of an extreme rainfall event (greater than 1 in 10 year event of 72 hours duration);
 - (d) vegetation and floating debris (emergent or otherwise) is prevented from encroaching onto pond surfaces or inner pond embankments; and
 - (e) no overflow leaves the Premises.
- 1.3.4 The Licensee shall ensure that where wastes produced on the Premises are not taken off-site for lawful use or disposal, they are only subjected to the on-site process(es) described in Table 1.3.4 and in accordance with the process requirements in that Table.

Table 1.3.4: Processing of materials

Waste type	Process	Process requirements
Treated wastewater	Evaporation	None
Carcasses	On-site burial	(i) Waste shall be covered with at least 500mm of soil immediately upon deposit; and (ii) Burial shall not take place within 300m of a watercourse or within 50m of premises boundaries.

2 Monitoring

2.1 General monitoring

- 2.1.1 The licensee shall ensure that:
- (a) all water samples are collected and preserved in accordance with AS/NZS 5667.1;
 - (b) all groundwater sampling is conducted in accordance with AS/NZS 5667.11; and
 - (c) all samples are submitted to a laboratory with current NATA accreditation for the parameters to be measured unless indicated otherwise in relevant table.
- 2.1.2 The Licensee shall ensure that six monthly monitoring is undertaken at least 5 months apart.
- 2.1.3 The Licensee shall have all monitoring equipment referred to in any condition of the Licence calibrated in accordance with the manufacturer's specifications.
- 2.1.4 The Licensee shall, where the requirements for calibration cannot be practicably met, or a discrepancy exists in the interpretation of the requirements, bring these issues to the attention of the CEO accompanied with a report comprising details of any modifications to the methods.

2.2 Ambient environmental quality monitoring

- 2.2.1 The Licensee shall undertake the monitoring specified in Table 2.2.1.



Table 2.2.1: Monitoring of ambient groundwater quality

Monitoring point reference (as depicted in schedule 1)	Parameter ¹	Units	Averaging period	Frequency
Monitoring bores: MB1, MB2, MB3, MB4, MB5, MB6, MB7	Nitrate-nitrogen	mg/L	Spot sample	Six monthly
	Ammonia-nitrogen	mg/L		
	Total Nitrogen	mg/L		
	Total Phosphorus	mg/L		
	Electrical Conductivity (EC)	µS/m		
	pH	-		
	Standing Water Level (SWL)	m(AHD) & mBGL		

Note 1: Electrical conductivity, pH and SWL are not required to be tested by a NATA accredited laboratory.

3 Improvements

3.1 Improvement programme

3.1.1 The Licensee shall complete the improvements in Table 3.1.1 by the date specified.

Table 3.1.1: Improvement programme

Improvement reference	Improvement	Date of completion
IR1	The licensee shall prepare and submit to the CEO a report on groundwater monitoring bores MB4, MB5, MB6 and MB7 as specified in Table 2.2.1. The report shall include: (a) a comparison of installation against the requirements of <i>Minimum Construction Requirements for Water Bores in Australia</i> (AIH 2012); (b) a comparison of siting against the Department of Water <i>Water Quality Protection Note 30 Groundwater Monitoring Bores</i> (DoW 2009) (c) the ground level (to Australian Height Datum) of each monitoring location accurately determined through survey; and (d) a map of groundwater monitoring bore locations accompanied by GPS coordinates.	31/01/2017

4 Information

4.1 Records

4.1.1 All information and records required by the Licence shall:



- (a) be legible;
- (b) if amended, be amended in such a way that the original and subsequent amendments remain legible or are capable of retrieval;
- (c) except for records listed in 4.1.1(d) be retained for at least 6 years from the date the records were made or until the expiry of the Licence or any subsequent licence; and
- (d) for those following records, be retained until the expiry of the Licence and any subsequent licence:
 - (i) off-site environmental effects; or
 - (ii) matters which affect the condition of the land or groundwater.

4.1.2 The Licensee shall ensure that:

- (a) any person left in charge of the Premises is aware of the conditions of the Licence and has access at all times to the Licence or copies thereof; and
- (b) any person who performs tasks on the Premises is informed of all of the conditions of the Licence that relate to the tasks which that person is performing.

4.1.3 The Licensee shall complete an Annual Audit Compliance Report indicating the extent to which the Licensee has complied with the conditions of the Licence, and any previous licence issued under Part V of the Act for the Premises for the annual period.

4.1.4 The Licensee shall implement a complaints management system that as a minimum records the number and details of complaints received concerning the environmental impact of the activities undertaken at the Premises and any action taken in response to the complaint.

4.2 Reporting

4.2.1 The Licensee shall submit to the CEO at the Contact Address an Annual Environmental Report within 62 calendar days after the end of the annual period. The report shall contain the information listed in Table 4.2.1 in the format or form specified in that table.

Table 4.2.1: Annual environmental report		
Condition or table (if relevant)	Parameter	Format or form ¹
-	Summary of any failure or malfunction of any pollution control equipment or any incidents that have occurred during the annual period and any action taken	None specified
4.1.3	Compliance	AACR
4.1.4	Complaints summary	None specified
Table 2.2.1	Nitrate-nitrogen, ammonia-nitrogen, Total Nitrogen, total Phosphorus, Standing Water Level, pH and electrical conductivity	AGQ1
-	List of monitoring methods used to collect and analyse data required by any condition of this licence.	None specified
-	Total number of animals	Tabular format: monthly maximum including annual total

Note 1: Forms are in Schedule 2

4.2.2 The Licensee shall ensure that the annual environmental report also contains:

- (a) an assessment of the information contained within the report against previous monitoring results; and
- (b) a list of any original monitoring reports submitted to the Licensee from third parties in the reporting period and make these reports available on request.



4.3 Notification

4.3.1 The Licensee shall ensure that the parameters listed in Table 4.3.1 are notified to the CEO at the Contact Address and in accordance with the notification requirements of the table.

Table 4.3.1: Notification requirements			
Condition or table (if relevant)	Parameter	Notification requirement¹	Format or form²
-	Any monitoring bores are de-commissioned, damaged or rendered unusable.	Within 7 days	None specified
2.1.4	Calibration report	As soon as practicable	None specified

Note 1: No notification requirement in the Licence shall negate the requirement to comply with s72 of the Act.

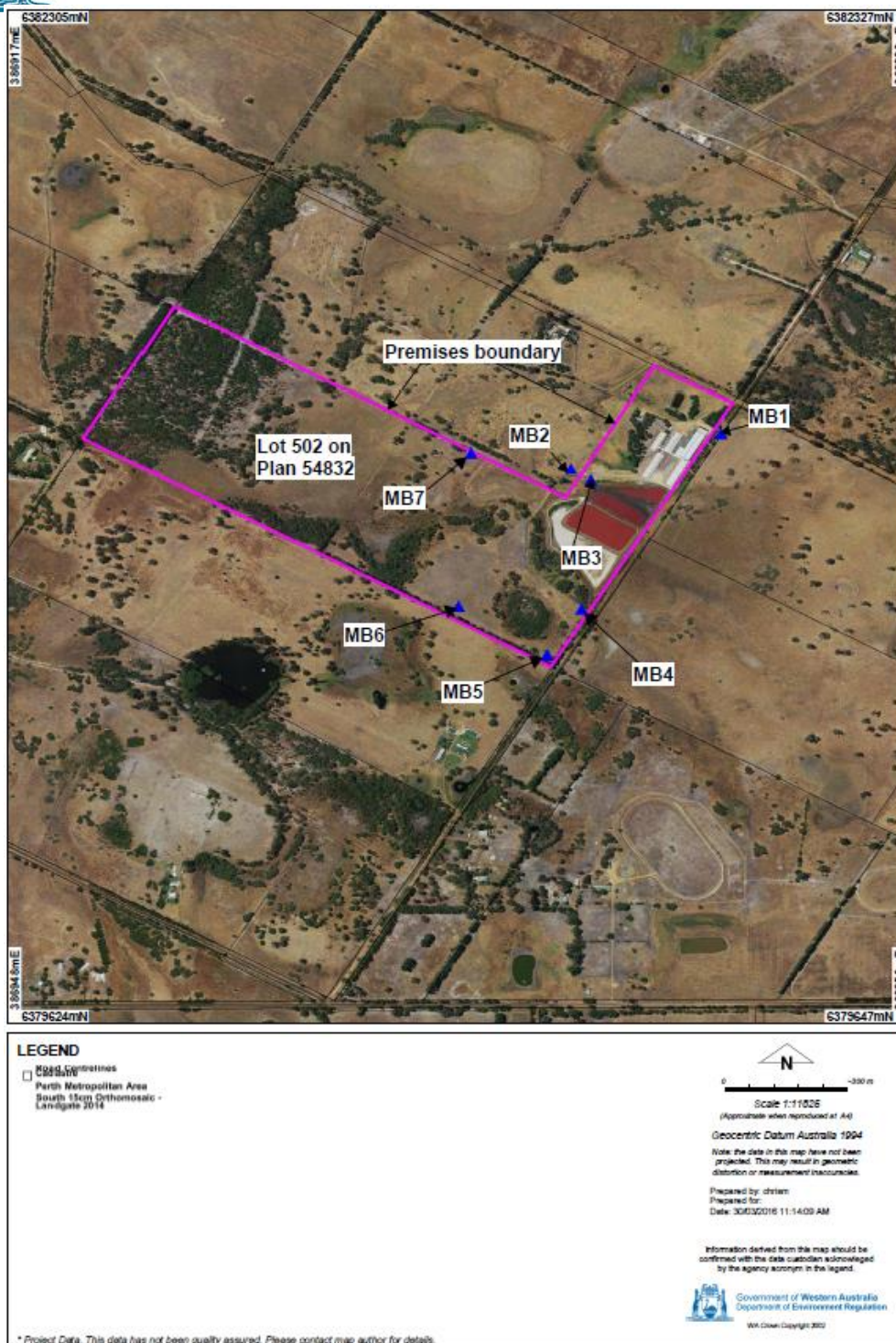
Note 2: Forms are in Schedule 2



Schedule 1: Maps

Premises map and map of ambient monitoring points

The Premises is shown in the map below. The pink line depicts the Premises boundary and the blue triangles depict the location of groundwater monitoring bores as referenced in Table 3.2.1.





Schedule 2: Reporting & notification forms

These forms are provided for the proponent to report monitoring and other data required by the Licence. They can be requested in an electronic format.

Copies of the original monitoring reports must also be submitted.

Licence:	L7286/1998/10	Licensee:	GD Pork Pty Ltd
Form:	AACR	Period :	
Name:	Annual Audit Compliance Report		

Annual Audit Compliance Report

Section A: Statement of compliance with Licence conditions

Were all conditions of licence complied with within the reporting period?		
Yes	<input type="checkbox"/>	Initial Sections A & B, then proceed to Section C
No	<input type="checkbox"/>	Initial Section A, then proceed to Section B

Each page must be initialised by the person(s) who signs Section C of this annual audit compliance report (AACR).

Initial:



Section B: Details of non-compliance with Licence condition

a) Licence condition not complied with?	
b) Date(s) b) Date(s) and time(s) the non compliance occurred, if applicable?	
c) Was this non compliance reported to DER?	
<input type="checkbox"/> Yes, and <input type="checkbox"/> Reported to DER verbally Date <input type="checkbox"/> Reported to DER in writing Date	<input type="checkbox"/> No
d) Has DER taken, or finalised any action in relation to the non compliance?	
e) Summary of particulars of non compliance, and what was the environmental impact?	
f) If relevant, the precise location where the non compliance occurred (attach map or diagram)	
g) Cause of non compliance	
h) Action taken or that will be taken to mitigate any adverse effects of the non compliance	
i) Action taken or that will be taken to prevent recurrence of the non compliance	

Please use a separate page for each Licence condition that was not complied with. Each page must be initialled by the person(s) who signs Section C of this AACR

Initial:



Section C: Signature and certification

This AACR may only be signed by a person(s) with legal authority to sign it as defined below. Please tick the box next to the category that describes how this AACR is being signed. If you are uncertain about who is entitled to sign or which category to tick, please contact the licensing officer for your premises.

If the Licence holder is		The AACR must be signed and certified:
an individual	<input type="checkbox"/>	by the individual Licence holder, or
	<input type="checkbox"/>	by a person approved in writing by the Chief Executive Officer (CEO) of DER to sign on the Licensee's behalf.
a corporation	<input type="checkbox"/>	by affixing the common seal of the Licensee in accordance with the Corporations Act 2001; or
	<input type="checkbox"/>	by two directors of the Licensee; or
	<input type="checkbox"/>	by a director and a company secretary of the Licensee, or
	<input type="checkbox"/>	if the Licensee is a proprietary company that has a sole director who is also the sole company secretary – by that director, or
	<input type="checkbox"/>	by the principal executive officer of the Licensee; or
	<input type="checkbox"/>	by a person with authority to sign on the Licensee's behalf who is approved in writing by the CEO of DER.
A public authority (other than a local government)	<input type="checkbox"/>	by the principal executive officer of the Licensee; or
	<input type="checkbox"/>	by a person with authority to sign on the Licensee's behalf who is approved in writing by the CEO of DER.
a local government	<input type="checkbox"/>	by the CEO of the Licensee; or
	<input type="checkbox"/>	by affixing the seal of the local government.

It is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give information on this form that to their knowledge is false or misleading in a material particular. There is a maximum penalty of \$50,000 for an individual or body corporate.

I/We declare that the information in this AACR is correct and not false or misleading in a material particular.

Signature: _____ Signature: _____

Name: (printed) _____ Name: (printed) _____

Position: _____ Position: _____

Date: ____/____/____ Date: ____/____/____

Seal (if signing under seal)



Licence: L9142/2018/1

Form: AGQ1

Name: Monitoring of ambient groundwater quality

Licence: GD Pork Pty Ltd

Period :

Form AGQ1: Monitoring of ambient groundwater quality					
Emission point	Parameter	Result ¹	Averaging period	Method	Sample date & times
MB1	Nitrate-Nitrogen	mg/L	Spot sample		
	pH	-			
	Electrical conductivity (EC)	µS/cm			
	Ammonia-nitrogen	mg/L			
	Total Nitrogen (TN)	mg/L			
	Total phosphorus (TP)	mg/L			
	Standing Water Level (SWL)	m(AHD) & mBGL			
MB2	Nitrate-Nitrogen	mg/L	Spot sample		
	pH	-			
	Electrical conductivity (EC)	µS/cm			
	Ammonia-nitrogen	mg/L			
	Total Nitrogen (TN)	mg/L			
	Total phosphorus (TP)	mg/L			
	Standing Water Level (SWL)	m(AHD) & mBGL			
MB3	Nitrate-Nitrogen	mg/L	Spot sample		
	pH	-			
	Electrical conductivity (EC)	µS/cm			
	Ammonia-nitrogen	mg/L			
	Total Nitrogen (TN)	mg/L			
	Total phosphorus (TP)	mg/L			
	Standing Water Level (SWL)	m(AHD) & mBGL			

Signed on behalf of GD Pork Pty Ltd..... Date:



Application for (Replacement) Licence

Division 3, Part V *Environmental Protection Act 1986*

Licence Number:	L9142/2018/1
Licence Holder	GD Pork Pty Ltd
ACN	126 978 685
File Number:	DER2018/000976
Premises:	GD Pork Pty Ltd - Pinjarra 502 Sutters Lane West Pinjarra Lot 502 on Deposited Plan 54832 Certificate of Title Volume 2677 Folio 599
Date of report:	3 July 2018
Status of Report	Final

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1. Definitions of terms and acronyms

In this Decision Report, the terms in Table 1 have the meaning defined.

Table 1: Definitions

Term	Definition
ACN	Australian Company Number
Applicant	GD Pork Pty Ltd
Category/Categories (Cat.)	categories of prescribed premises as set out in Schedule 1 of the EP Regulations
CEO	Chief Executive Officer
Decision Report	this document
Delegated Officer	An officer under section 20 of the EP Act.
DWER	Department of Water and Environmental Regulation As of 1 July 2017, the Department of Environment Regulation (DER), the Office of the Environmental Protection Authority (OEPA) and the Department of Water (DoW) amalgamated to form the Department of Water and Environmental Regulation (DWER). DWER was established under section 35 of the <i>Public Sector Management Act 1994</i> and is responsible for the administration of the <i>Environmental Protection Act 1986</i> along with other legislation.
EP Act	<i>Environmental Protection Act 1986 (WA)</i>
EP Regulations	<i>Environmental Protection Regulations 1987 (WA)</i>
NEGP	<i>National Environmental Guidelines for Piggeries</i> (Australian Pork Limited, 2010)
Premises	As specified as the <i>Premises</i> on page i of this Decision Report
Prescribed Premises	Premises prescribed under Schedule 1 to the EP Regulations
Primary Activities	is defined in DER's <i>Guidance Statement: Risk Assessments</i> to include the primary activities which fall within the description of the category of prescribed premises in Schedule 1 to the EP Regulations.
Prescribed premises	premises prescribed under Schedule 1 to the EP Regulations.
Prescribed Standard	In this assessment, refers to the Noise Regulations
Risk Event	As described in <i>Guidance Statement: Risk Assessment</i>
SPU	Standard pig unit as defined in NEGP

2. Purpose and scope of assessment

GD Pork Holdings Pty Ltd (the Applicant) operates an intensive piggery at Lot 502 on Deposited Plan 54832 Sutters Lane, West Pinjarra. The Applicant held licence L7286/1998/11 until 30 April 2018 when an administrative error caused the licence to cease to have effect pursuant to regulation 5DA of the *Environmental Protection Regulations 1987* (EP Regulations).

The Applicant lodged an application for a new (replacement) licence with the Department of Water and Environmental Regulation (DWER) on 14 June 2018 (the Application) using a reduced scope administrative application form approved by the Chief Executive Officer (CEO) of DWER. In the circumstances, the DWER has determined the most appropriate course of action is replacement of the licence with the same conditions and expiry date as per the ceased licence L7286/1998/11.

Ceased licence L7286/1998/11 was granted on 30 March 2016 and accompanied by Decision Document that included assessment of emissions from the Premises and determination of licence conditions. Ceased licence L7286/1998/11 and its Decision Document are available on the Departments website as listed in Appendix 1. This Decision Report therefore does not include additional risk assessment or determination of controls beyond ceased licence L7286/1998/11 and is limited to documenting the Delegated Officer's determination of a new (replacement) licence, primarily as an administrative matter to replace the licence.

3. Background

The Premises are located within the Peel region of Western Australia, approximately 7.9 km southwest of the Pinjarra town site in the Shire of Murray. The Licence Holder purchased the Premises and has operated the piggery since 2007.

The Applicant held licence L7286/1998/11 until 30 April 2018 when it ceased to have effect. There are several residences in proximity to the piggery, the closest of which is less than 350 m from the pig sheds. The site continues to be subject to odour complaints from local residents.

The Applicant holds works approval W5687/2014/1 for the expansion of the piggery to increase the capacity of approximately 3121 SPU to 6854 SPU. The Department assessed that, regardless of the increased capacity, the upgrades to the facility would improve odour emissions from the Premises. The works approval was amended in June 2016 to implement the then Minister for Environment's determination of appeals against the conditions of the works approval. The works approval expires on 27 September 2018.

On 16 January 2018, GD Pork applied to amend its licence duration for a further six months while the expansion works under the works approval were completed. The Application had estimated the works would be complete by July 2018 and the licence duration was subsequently extended to 27 September 2018 to align with the works approval expiry. The amendments to increase the licence period were not appealed by the Applicant or the public.

GD Pork submitted works approval compliance information on 2 March 2018 and a licence amendment application on 15 March 2018 to allow operation of the expanded piggery. The works had not been completed pursuant to the provision of the Works Approval and as such the licence amendment application could not be accepted.

In June 2018, DWER identified that annual fees for licence L7286/1998/11 had not been paid by 30 April 2018 causing the licence to cease to have effect pursuant to regulation 5DA of the EP Regulations. DWER investigations identified this was an administrative error from the non-generation of a fee reminder and invoice for the Applicant. While not a statutory requirement for the Department to send fee reminder notifications, it is standard procedure for this to occur in advance of the end of a fee period.

The cessation of licence L7286/1998/11 also caused the 15 March 2018 licence amendment application to become redundant as a ceased licence cannot be amended.

The Application is for the Categories in Table 2 below which is consistent with ceased licence L7286/1998/11.

Table 2: Prescribed Premises Categories in the Application

Classification of premises	Description	Production or design capacity
2	Intensive piggery: premises on which pigs are fed, watered and housed in pens.	3121 Standard pig units (SPU)

4. Consultation

The Delegated Officer identified properties owners in close proximity to the Premises and the Shire of Murray as direct interest stakeholders. Six residents were notified of the Application by hardcopy mail seeking comment. A further nine were similarly contacted via email requesting comment.

The Application was advertised in the *West Australian* newspaper and published on the Department's website. The consultation period was seven days and considered appropriate in the circumstances of a replacement licence with no additional risk assessment or condition changes.

DWER received one written submission during the seven day consultation period. The submission commented upon the odour impacts. Further consultation and consideration of odour controls for the expanded piggery will occur through assessment and determination of a replacement licence amendment application as outlined in Section 5.

The Department maintains a 'Community Updates' webpage on its website with information about licensing and regulatory matters for the Premises. The webpage was updated prior to the commencement of the consultation period and direct interest stakeholders encouraged to access the webpage.

5. Determination of new licence

The Applicant lodged an application for a new (replacement) licence to seek a licence to replace ceased licence L7286/1998/11. The Application is in respect of an administrative error that result in licence L7286/1998/11 ceasing to have effect. The replacement licence contains the same conditions as ceased licence L7286/1998/11 and the previous expiry date of 27 September 2018 has been retained.

A 15 March 2018 application to amend L7286/1998/11 in respect of works completed under W5687/2014/1 has also become redundant due to the cessation and is not considered in this Decision Report. The Applicant had not completed the works pursuant to the provisions of the Works Approval and as such the licence amendment application could not be accepted.

The Applicant will need to lodge a replacement licence amendment application to include the expanded piggery. The Delegated Officer took into account that if a new (replacement) licence amendment application is lodged and subsequently accepted, it will be advertised for public comment and direct interest stakeholders will be notified in a separate process.

6. Applicant's comments

The draft Decision Report and draft new (replacement) licence were provided to the Applicant on 28 June 2018 for comment. The Applicant responded on 2 July 2018 waiving the remainder of the comment period with no comments.

7. Conclusion

This Decision Report has been prepared to document the replacement of ceased licence L7286/1998/11 with a new licence containing the same conditions with no additional risk assessment. The Delegated Officer determined the Application with due consideration to the circumstances of a DWER administrative error causing licence L7286/1998/11 to cease to have effect.

This assessment was also informed by a site visit on 18 June 2018 by a DWER Officer.

Based on this Decision Report, a replacement licence has been granted subject to the same conditions as ceased licence L7286/1998/11.

Paul Byrnes
Manager, Licensing (Process Industries)
Regulatory Services (Environment)

Delegated Officer
under section 20 of the *Environmental Protection Act 1986*

Appendix 1: Key documents

	Document Title	In text ref	Availability
1.	<i>Application for a new (replacement) licence lodged by GD Pork Pty Ltd on 14 June 2018</i>	the Application	DWER records (A1697442)
	Licence 7286/1998/11	Ceased licence L7286/1998/11	https://www.der.wa.gov.au/our-work/licences-and-works-approvals
	Works Approval W5687/2010/1	Works approval W5687/2010/1	https://www.der.wa.gov.au/our-work/licences-and-works-approvals

Appendix 2: Replacement Licence L9142/2018/1
