



12 November 2019

The Director General
NSW Planning, Industry and Environment
Level 22, 320 Pitt Street
GPO Box 39
Sydney NSW 2001

Attention Chris Ritchie: DA 220-07-2002-i

Dear Chris,

As recommended within the independent environmental audit undertaken on the 13-15th November 2017, there exists an opportunity to better align the Conditions of Consent with the current site operations. It is Teys belief that rewording and removing certain conditions may better reflect changes implemented onsite. Notably, these conditions are:

- *5.6(d). Offensive odour notification*
As one of the largest meat processors within Australia, Teys take environmental responsibility seriously, and continue to heavily invest in facilities that allow for reductions in aspects that may cause environmental harm. Odour is one area of focus, to which Teys not only implemented recommendations made within the 2012 OIA, but have built an enclosed waste water treatment facility, and more recently, a state of the art biofilter. Since commissioning of the new biofilter, there has been significant odour reductions across the site. Further works were carried out to improve the biofilter in June 2019 and nil odour complaints have been received since.
- *6.1.Air Quality Monitoring – Odour*
Over the past years, Teys has invested heavily in odour reduction, including upgrades to the waste water treatment plant in 2011, and an improved biofilter, commissioned in May 2016. These upgrades have allowed for Teys to further their compliance with the 4 OU criteria, and improve upon odour dispersion identified within the original 2012 OIA.
- *6.8. Independent Environmental Auditing:*
Due to the upgrades on the plant, mainly the waste water treatment plant, Teys have undergone 3 separate Independent Environmental Audits (IEA) from 2011, to 2017. All audits have made recommendations surrounding opportunities for improvement within various aspects onsite, to which Teys have implemented most, if not all of these recommendations.

1. Rewording of condition 5.6(d).

Teys were of the understanding that condition 5.6(d) a), notification to both the OEH and Director General, were for the duration of the effluent system upgrade. Upon receipt of odour complaints the EPA are notified immediately, and as part of condition 8.3d), complaints are reported within the AEMR for the Department to comment and, if required, advise corrective actions. Teys propose to reword the condition to:

5.6.(d) a) immediately notify EPA; and...

As this change only applies to the notification of odour complaints, pollution incidents would still require Teys to notify the Director General immediately (and all other relevant authorities).

2. Removal of condition 6.1

Upon completion and submission of the odour impact assessment in June 2012, approval that this assessment complied with the EPA's 4OU criteria was received from the Department on the 6 September 2012, subject to recommendations within the report being fully implemented.

Teys provided the Department and EPA with an update on the implementation of recommendations made within the OIA on 17 September 2013, and requested relief from ongoing monitoring. Correspondence from the EPA was received on the 1 November 2013 stating that special condition E1.1, relating to the OIA, would be removed from the licence following upgrades undertaken on the rendering plant, and the waste water treatment plant. No response was received from the Department including feedback surrounding the implementation of recommendations within the report.

Following condition 7.6 of DA 220-07-2007, an Independent Odour Assessment (IOA) was undertaken by GHD in 2016, as part of the new biofilter. Within the IOA, an OU of 1.5 was detected at the nearest sensitive receptor, demonstrating that Teys are complying with the EPA's aforementioned criteria.

As Teys have confirmed that this is no longer a requirement for the EPA, Teys would like to request that the condition be removed from within the conditions of consent to better reflect the removal of this condition from the site EPL.

3. Rewording of condition 6.8

Since the commissioning of the effluent system upgrade, the Teys Wagga facility has undergone three separate independent environmental audits to fulfil the requirements listed within condition 6.8. As recommended, an internal audit would provide the same value as what the independent audits currently provide. Teys propose to reword the condition to:

*6.8. Within 18 months of the date of approval of DA 220-07-2002-I Mod 4, and every 3 years thereafter, unless the Director-General directs otherwise, the Applicant shall commission and pay the full cost of an Internal Environmental Audit of the project.
This audit must: ...*

As demonstrated within the last independent audit, the site is delivering a high level of compliance in relation to the relevant regulations. Teys believe that as recommendations identified within previous audits have been implemented, an

internal audit would provide the same value as an IEA. The internal audit would be undertaken in a way that would align with previous IEA's, and would accompany previous reports.

In addition to seeking removal of the aforementioned conditions, Teys seek approval for the modification of approved developments onsite with the construction of a blood separation and plasma plant alongside current production and a change of conditions to operate a turf farm and grow turf crops in the approved effluent irrigation areas. Please see the combined Statement of Environmental Effects (SEE) for these modified developments attached to support this application.

4. Blood separation and plasma plant:

Tey's propose to construct and install a blood separation and plasma collection system located adjacent to the beef slaughter processing facility located at Teys Australia Wagga Wagga. Currently all blood product is sent to the onsite render process facility for processing into blood meal. Modification to the current system will allow diversion of the blood process flow for separation into blood Plasma and Haemoglobin, with Plasma being separated and stored under controlled conditions for product delivery and further processing and value added revenue stream. Haemoglobin being delivered back to the original process for blood meal production.

For operational control, the current blood system will remain in place if required for any purposes. Nil significant environmental impacts have been identified for this change in process due to the small scale of the proposed structures, the proximity to existing plant and all services currently existing onsite. Construction and ongoing operation of the system will be controlled through the site Construction Environmental Management Plan (CEMP) and Operational Environmental Management Plan (OEMP), which will be reviewed and updated where necessary.

5. Turf Farming and Turf Crop:

Tey's have previously received consent through the Department (DA 220-07-2002-I Mod 5) to provide effluent for lucerne crop in designated areas onsite (CFA High and CFA Low). With the nature of the region and different business opportunities, Teys are seeking approval to modify and operate a turf farming business and grow different turf crops.

As shown in the EPA *Use of Effluent by Irrigation (2004)*, there is a trivial difference between Lucerne, turf varieties such as Kikuyu and yield and nutrient removal. Continuation of turf farming and crops on Teys property will not result in any material change to operations and all effluent is controlled and managed through the Effluent Wastewater Management Plan in the OEMP for the site. Environmental conditions remain the same, or in an improved state since originally consented and evidence around this can be found in the relevant SEE.

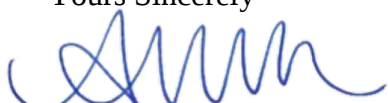
In accordance with Section 4.55(1A) of the EP&A Act, the modified developments will be substantially the same as the originally approved development and result in minimal environmental impact. The proposed modifications will not result in any adverse environmental impacts or raise any additional environmental issues.

In light of the above, Teys therefore recommend that the proposed modifications are supported. Teys trust that this information is sufficient to enable a prompt assessment of the proposed modifications.

Tey's welcome any feedback that the Department are able to provide on the above changes, and welcome the opportunity to address any concerns that the Department may have.

If you have any queries or concerns in relation to this matter, please do not hesitate in contacting the site Environment Officer, Marnie Mannering, direct on 02 6938 3000.

Yours Sincerely



PP Amelia Simony 13/11/2019

Stephen Thomson
General Manager (Operations)
Tey's Australia Wagga Wagga