PSA CONSULTING

SSD-9394 MODIFICATION REPORT

SSD-9394 MODIFICATION REPORT – CHANGES TO WASTEWATER TREATMENT PLANT

13 April 2026

Baiada

LAND USE PLANNING | DEVELOPMENT APPROVALS | TRANSPORT PLANNING | TRAFFIC ENGINEERING | PROGAM MANAGEMENT | INFRASTRUCTURE

DOCUMENT CONTROL

Document: Project Name: Oakburn Processing Facility
PSA Job Number: 1963
Report Name: SSD-9394 MODIFICATION REPORT

This document has been prepared for:

Baiada

Contact Baiada Poultry
PO Box 21
Pendle Hill NSW 2145

This document has been prepared by:

PSA CONSULTING

Contact: David Ireland
PSA Consulting (Australia) Pty Ltd
PO Box 10824, Adelaide Street, Brisbane QLD 4000
Telephone: +61 7 3220 0288
david.ireland@psaconsult.com.au
www.psaconsult.com.au

REVISION HISTORY

VERSION	DATE	DETAILS	AUTHOR	AUTHORISATION
V10	13 April 2026	FINAL	David Ireland	David Ireland

GENERAL DISCLAIMER

The information contained in this document produced by PSA Consulting (Australia) Pty Ltd is for the use of Baiada Poultry for the purpose for which it has been prepared, and PSA Consulting (Australia) Pty Ltd undertakes no duty of care to or accepts responsibility to any third party who may rely upon this document.

EXECUTIVE SUMMARY

On 18 December 2020, the Minister for Planning and Public Spaces issued Development Consent (SSD-9394) for the construction and operation of the Baiada's Integrated Poultry Processing Facility including:

- Poultry processing facility, with capacity to process up to 3 million birds a week.
- Protein Recovery Plant, with capacity to render up to 1,680 tonnes of finished product per week.
- Wastewater treatment plant.
- Advanced water treatment plant.
- Road connection to Workshop Lane.
- Earthworks.
- Connections to infrastructure.

On 23 May 2024, the Minister for Planning and Public Spaces approved a modification (SSD-9394-MOD-1) of the consent under Section 4.55(1A) of the *Environmental Planning and Assessment Act 1979,* allowing for a range of physical changes to the facility resulting from the detailed design process including updates to the processing building, administration building and staff parking areas, maintenance building, supporting plant and infrastructure and wastewater / advanced wastewater treatment process, water storage facilities and associated infrastructure.

Since approval of MOD-1, Baiada has proceeded with the construction phase and the detailed design of the project and equipment selections which has resulted in several minor modifications of the approved buildings and operations on the site. Operations from the site are intended to commence in mid-2026.

This modification (MOD-6) is seeking approval for the staged delivery of wastewater treatment, which will enable commencement of operations in the short term, expand the treatment process concurrently with production, implement wastewater treatment processing technology that will reduce the biological load being sent for further treatment, reduce electricity usage, facilitate the future production of biogas and ultimately allow for advanced water treatment to occur either on or off site.

It is important to note that the final design of Stage 3 of the wastewater treatment process will be subject to refinement and consideration of potential on and off site solutions. As such, it is recommended that the modified SSD Consent will need to allow for submission of detailed design prior to commencement of Stage 3 of the poultry processing operations.

Baiada remains committed to sustainable water management and contributing to water security in the region by reducing its reliance on and usage of mains potable water, and in this regard the processing plant is designed and constructed with the ability to receive and distribute advanced treated water throughout the facility.

It is important to note that the proposed changes to wastewater treatment will not alter the general poultry processing and rendering activities approved on the site (i.e. processing of 3 million birds / week and rendering up to 1,680 tonnes of finished product per week).

To facilitate these changes, a modification of the current approval under Section 4.55 (1A) of the *Environment Planning and Assessment Act 1979* is proposed. As demonstrated in this Modification report, the proposed development remains substantially the same as that which was approved, maintains compliance with the relevant statutory planning instruments and will not result in new or unacceptable adverse environmental impacts on the receiving environment.

The proposed modification introduces the staged delivery of wastewater treatment, which will enable commencement of operations in the short term and allow for advanced wastewater treatment either on or off site as part of Stage 3. The staging reflects agreements reached with Council since the original issuing of the development consent, regarding the provision of potable water supply to the site, and trade waste discharge. Where potential impacts have been identified, suitable mitigation and management measures have been implemented. Accordingly, approval of the proposed modification is recommended.

TABLE OF CONTENTS

FIGURES

TABLES

LIST OF ACRONYMS

AWTP	Advanced Water Treatment Plant
ABARES	Australian Bureau of Agricultural and Resource Economics and Sciences
BAL	Bushfire Attack Level
BFAR	Bushfire Assessment Report
BFPM	Bushfire Protection Measures
BNR	Biological Nutrient Removal
CAL	Covered Anaerobic Lagoon
CIV	Capital Investment Value
DPHI	Department of Planning, Housing and Infrastructure
EPA	Environmental Protection Agency
Ha	Hectare
IAC	Impact Assessment Criteria
LPG	Liquified Petroleum Gas
ML	Megalitre
NIA	Noise Impact Assessment
NPfI	Noise Policy for Industry
PHA	Preliminary Hazard Assessment
PNTL	Project Noise Trigger Levels
RNP	Road Noise Policy
SBR	Sequence Batch Reactor
SEPP	State Environmental Planning Policy
SSD	State Significant Development
TIA	Traffic Impact Assessment
WWTP	Wastewater Treatment Plant

1 INTRODUCTION

1.1 SITE OVERVIEW

Address	1154 Gunnedah Road, Westdale, NSW
Property	Lot 100 on DP1097471 (Processing facility, Rendering Plant and Ancillary Infrastructure)
	Lot 101 on DP1097471 (Access Road)
	Lot 102 on DP1097471 (Access Road)
Landowner	Baiada (Tamworth) Pty Limited (Lot 100)
	Tamworth Regional Council (Lot 101 & 102)
Applicant	Baiada (Tamworth) Pty Limited
Consent Authority	Tamworth Regional Council
Zoning	RU1 – Primary Production (Tamworth Region Local Environmental Plan 2010)
Total Site Area	57.6 Ha (Lot 100)

Figure 1: Site and Surrounds

The subject site is located at 1154 Gunnedah Road, Westdale and described as Lot 100 on DP1097471. The site is located to the north of Tamworth Regional Airport, and approximately 7.5km northwest of the Tamworth Central Business District. The key components of the development (Poultry Processing facility, Rendering Plant, Wastewater Treatment Plant and Administration Building) are to be located within Lot 100 on DP1097471 which has an area of 57.4Ha. As the proposed development also includes the construction of a new access road connecting the site to Workshop Lane, the southeast adjoining lots (Lots 101 & 102 on DP1097471) are also included as part of this Development Application.

1.2 THE APPLICANT

Baiada (Tamworth) Pty Limited is part of the Baiada Group of Companies (Baiada) which includes the Steggles and Lilydale businesses. Baiada is a privately owned Australia company providing premium quality poultry products throughout Australia and has an employee base of more than 8,000 people which is forecast to increase to 9,200 by 2029. The Baiada business is fully integrated poultry operation encompassing broiler and breeder farms, hatcheries, processing facilities, feed milling and protein recovery. Baiada's products include the sale of live poultry (including breeding stock), poultry feed, fertile eggs, day old chickens, primary processed chicken (raw), processed chicken products and pet food.

Chicken meat is Australia's most consumed meat protein and is an affordable dietary staple for many people. According to a 2021 AgriFutures report, 68% of Australians eat chicken at least twice a week. This demand is growing as chicken's price remains stable and affordable compared to other protein sources. Baiada is Australia's largest integrated poultry producer, supplying 40% of the nation's chicken requirements. Baiada and its operations are essential to Australian food security, making expansion of Baiada's operations via the Oakburn Integrated Poultry Processing Facility critical to avoid supply shortages of this essential food.

1.3 THE APPROVED PROJECT

On 18 December 2020, the Minister for Planning and Public Spaces issued Development Consent (SSD-9394) for the construction and operation of the Baiada's Integrated Poultry Processing Facility including:

- Poultry processing facility, with capacity to process up to 3 million birds a week.
- Protein Recovery Plant, with capacity to render up to 1,680 tonnes of finished product per week.
- Wastewater treatment plant.
- Advanced water treatment plant.
- Road connection to Workshop Lane.
- Earthworks.
- Connections to infrastructure.

On 23 May 2024, the Minister for Planning and Public Spaces approved a modification (SSD-9394-MOD-1) of the consent under Section 4.55(1A) of the *Environmental Planning and Assessment Act 1979,* allowing for a range of physical changes to the facility resulting from the detailed design process including updates to the processing building, administration building and staff parking areas, maintenance building, supporting plant and infrastructure and wastewater / advanced wastewater treatment process, water storage facilities and associated infrastructure.

As noted above, since approval of MOD-1, Baiada has proceeded with detailed design and construction which resulted in some minor alterations to the approved buildings and operations which has triggered a number of modification as outlined below:

- **MOD-2 (Withdrawn):** This modification proposed changes to the Wastewater Treatment Plant which was subsequently withdrawn and has no bearing on this application.
- **MOD-3 (Approved):** This modification facilitated minor design changes to the approved buildings in response to detailed design.
- **MOD-4 (Approved):** This modification allowed for minor changes to the approved development footprint, updates to the landscape plans and approval of an updated BDAR.
- **MOD-5 (Under Assessment):** This modification seeks to update the approved dangerous goods to be used and stored on site in response to completion of detailed design, finalisation of equipment selections and clarification of operational procedures.

The approved wastewater treatment plant involved a staged process whereby the necessary plant and equipment was to be scaled up commensurate with production increases. The plant included an onsite Advanced Wastewater Treatment Plan (AWTP) with the ultimate ability to treat wastewater generated by the processing plant which was to be returned for re-use. The approved project involves the use of up to 51ML of potable water per week, of which 42 ML per week was to be provided via the Advanced Water Treatment Plant.

The approved development plan and waste water treatment layout are shown in *Figure 2* and *Figure 3* below.

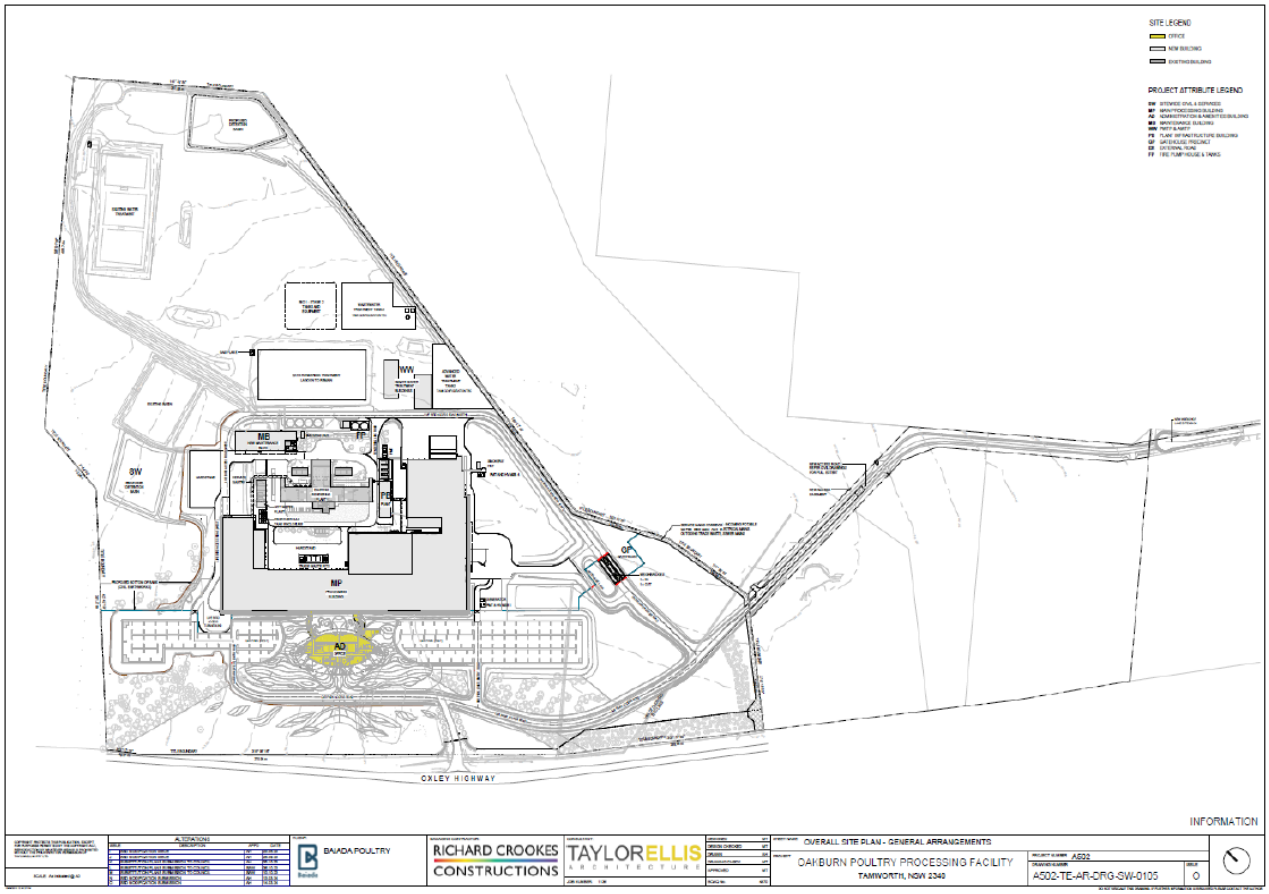


Figure 2: Approved Site Plan (SSD-9394-MOD-1)

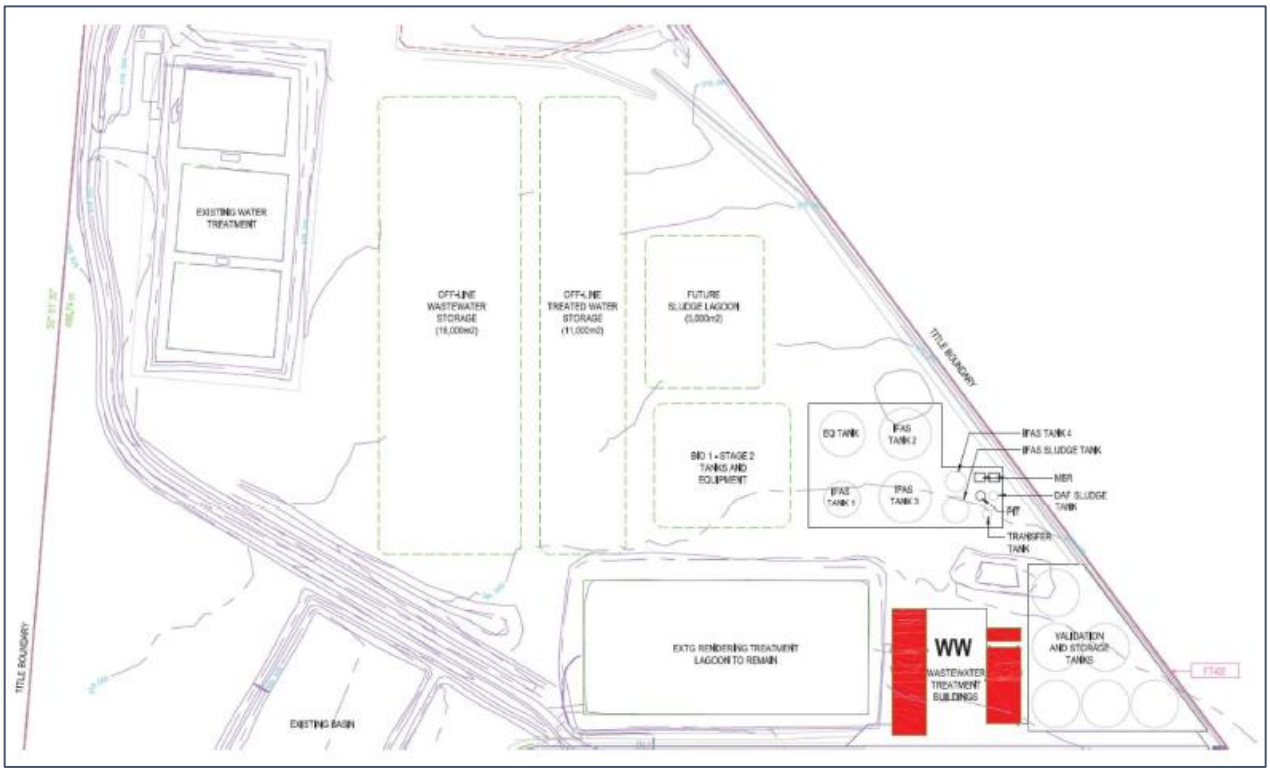


Figure 3: Approved WWTP/AWTP Layout (As per the original consent SSD-9394).

1.4 PROPOSED MODIFICATION

This modification (MOD-6) is seeking approval for the staged delivery of wastewater treatment at the site, which will enable commencement of operations in the short term, expand the treatment process concurrently with production, and ultimately allow for advanced water treatment to occur either on or off site. The staging also reflects agreements reached with Council regarding the provision of potable water supply to the site, and trade waste discharge. The 3 Stage delivery process of the wastewater treatment plant is shown in **Table 1** below.

Table 1: Staged Delivery of the Wastewater Treatment Plant (JJC, 2025)

Stage	Capacity	Scope	Trade Waste Agreement Requirements
1	9.6 ML/week	Covered Anaerobic Lagoon 1 (CAL1) Biogas Recovery & Reuse Biological Nutrient Removal Clear Well. Dissolved Air Flotation (DAF) for Phosphorous Removal Dewatering of DAF Sludge DAF used for primary treatment initially if needed.	Transition of Out Street TWA to Oakbum ➢ BOD 300 mg/L ➢ TKN 100 mg/L ➢ TN 100 mg/L ➢ TSS 300 mg/L ➢ TDS 1000 mg/L ➢ TP 20 mg/L ➢ NH3 50 mg/L ➢ pH 6.5-8.5 ➢ O&G 100 mg/L
2	25.6 ML/week	Increase Biological Nutrient Removal to reduce TN Divert Render Wastewater to CAL1. Demolish existing Render CAL.	➢ BOD 50 mg/L ➢ TN 20 mg/L ➢ TSS 50 mg/L ➢ NOX 2 mg/L ➢ TP 2 mg/L
3	51.2 ML/week	Add Covered Anaerobic Lagoon 2 (CAL2) Advanced treatment to produce approximately 30 ML/week of potable-equivalent water for reuse onsite (if AWTP not provided by TRC)	➢ BOD 50 mg/L ➢ TN 20 mg/L ➢ TSS 50 mg/L ➢ NOX 2 mg/L ➢ TP 2 mg/L

The staged upgrades to the wastewater treatment plant on the site will facilitate progressing increases in poultry processing as follows:

- **Stage 1 (Treating 9.6 ML per week):** Approximately 800,000 Birds.
- **Stage 2 (Treating 25.6 ML per week):** Approximately 1,500,000 Birds.
- **Stage 3 (51.2 ML per week):** 3,000,000 Birds.

It is important to note that the number of birds to be processed at Stage 1 and Stage 2 are estimates and based on the operation of existing processing plants. As this processing plant is brand new and has adopted best practice water efficiency measures throughout the entire process, it is expected additional birds will be processed per litre of water treated. Furthermore, there are other factors that influence the number of birds that can be processed and corresponding water usage. For example, the weight of the birds can influence water usage. As such, it is requested that the stages be conditioned in terms of the volume of wastewater treated as opposed to number of birds processed. This has been reflected in the requested amendments to the conditions of approval identified in **Section 3.5** of this report.

It is important to note that the proposed changes to wastewater treatment will not alter the general poultry processing and rendering activities approved on the site (i.e. processing of 3 million birds / week and rendering up to 1,680 tonnes of finished product per week). This modification does not seek to alter these limits.

The proposed modification introduces the staged delivery of wastewater treatment for the site, which will enable commencement of operations in the short term and allow for advanced wastewater treatment either on or off site. The amended site plan showing the staged upgrade of the WWTP is shown in ***Figure 4***, ***Figure 5***, and ***Figure 6*** below.

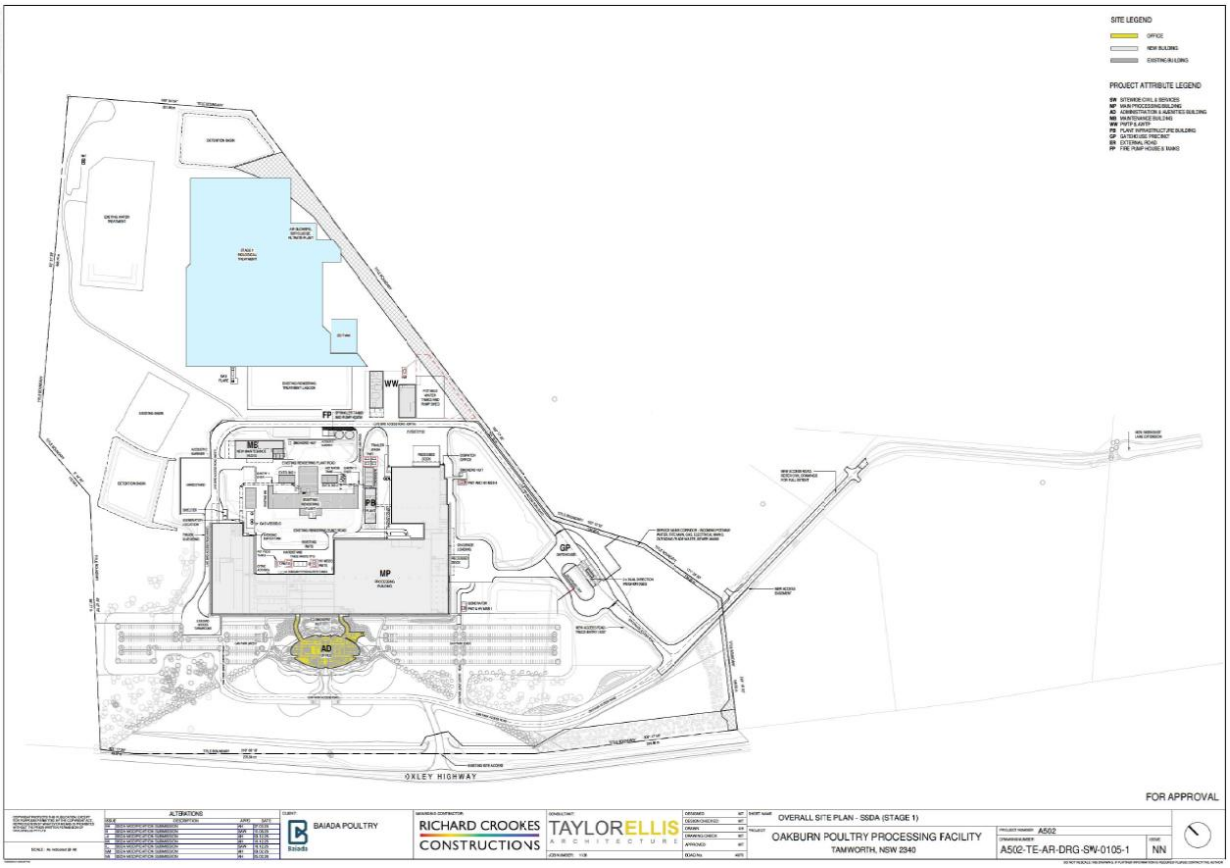


Figure 4: Proposed WWTP Layout - Stage 1

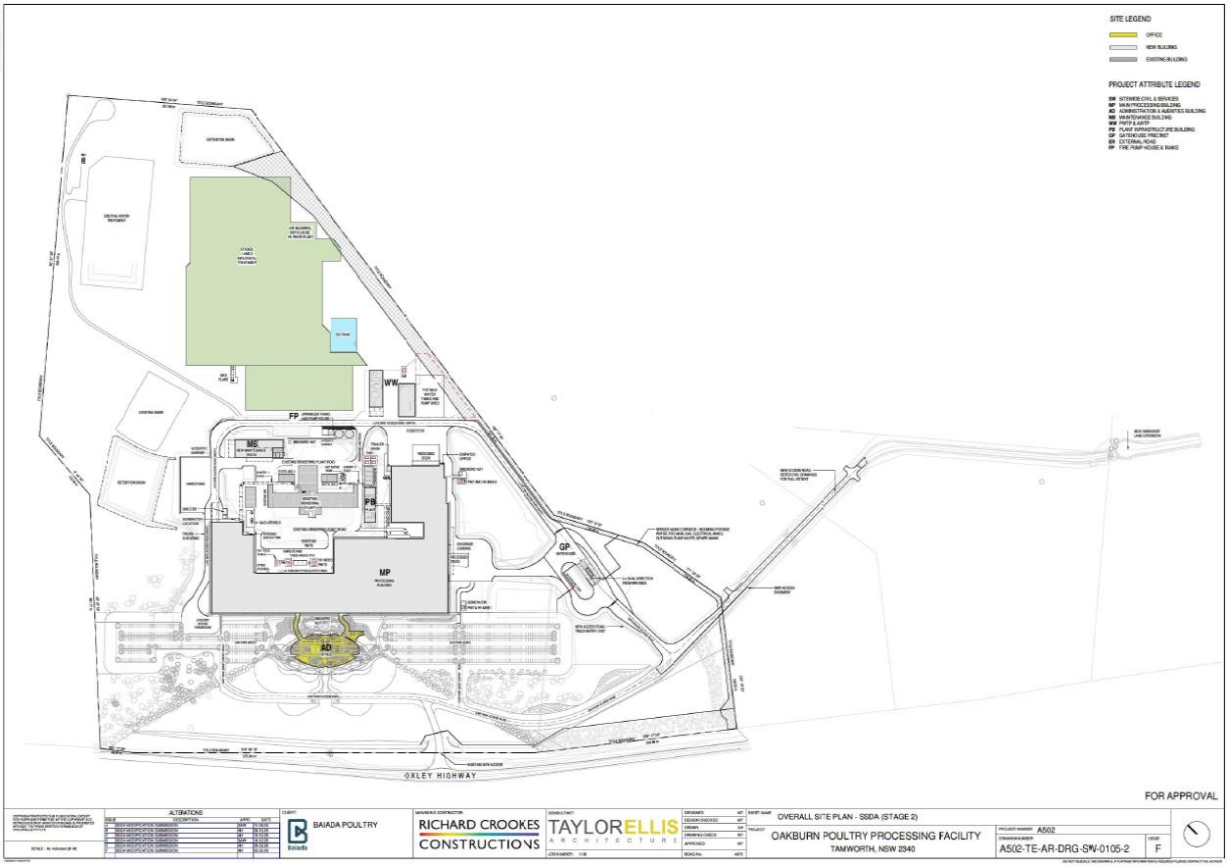


Figure 5: Proposed WWTP Layout - Stage 2

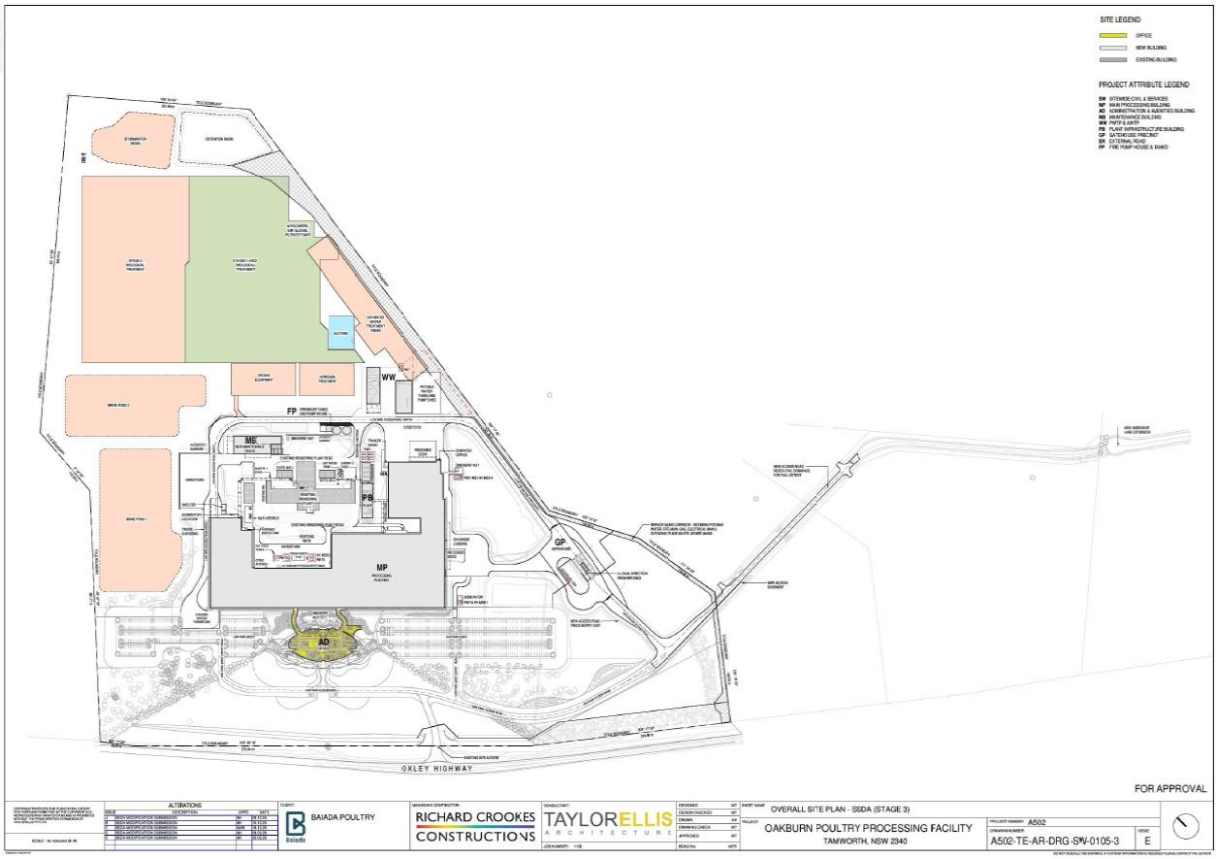


Figure 6: Proposed WWTP Layout – Stage 3 (Concept Design)

2 STRATEGIC CONTEXT

2.1 ORIGINAL CONTEXT AND CHANGES

As noted in the original EIS and subsequent Modification Applications, the poultry industry in Australia is experiencing ongoing growth and public demand for poultry products has resulted in the need for significant expansion of poultry production and processing activities across Australia, including Tamworth.

Since approval of the modified project in May 2023, Baiada has proceeded with detailed design of the facility, commenced construction and is aiming to commence operations in mid-2026. The critical change with respect to this modification is a refined staging approach to delivery of wastewater treatment for the site, which will enable commencement of operations in the short term, expand the treatment process concurrently with production across three stages, and ultimately allow for advanced water treatment to occur either on or off site. The staging also reflects agreement reached with Council regarding the provision of potable water supply to the site, and trade waste discharge.

In this regard, Stage 1 represents a transfer of the current trade waste allowances from the existing Out Street Poultry Processing Plant to the Oakburn facility, which will not result in change to the current quantity of wastewater (~12.8ML / WK, comprising 3.15ML / WK – Rendering and 9.6ML / WK - Processing) discharged to Council's Westdale Wastewater Treatment Plant (the Westdale WWTP) For Stage 1, the existing Rendering WWTP will continue to operate in accordance with its current trade waste agreement (discharging 3.15ML / WK) to the Westdale WWTP. Wastewater from processing will be treated at the new on-site Wastewater Treatment Plant including a Covered Anaerobic Lagoon (CAL), Biological Nutrient Removal (BNR) System, Phosphorus Removal Plant Equalisation Tank, Dissolved Air Flotation Tank and Clear Well (9.6ML / WK). The Trade Waste Agreement for Stage 1 is included as **Appendix 9.**

Stage 2 will involve demolition of the existing rendering plant treatment lagoon (the existing CAL) and integration of the Rendering WWTP with the new WWTP. Following treatment on site, treated wastewater (25.6 ML / WK) will be discharged as trade waste for further treatment at the Westdale WWTP. Commencement of Stage 2 will be subject to entry into a new temporary Trade Waste Agreement with Council for the increased discharge volume.

Stage 3 involves expansion of Stage 2 infrastructure and construction of the Advanced Water Treatment Plant (including brine management solutions), which will have the capacity to return up to 30ML/WK of advanced treated water for re-use on the site. Once Stage 3 is implemented, the wastewater discharged to the Westdale WWTP will be reduced to Stage 1 levels (12.8ML / WK).

. Pursuant to commercially confidential agreements (provided separately to DPHI), town water in the amount disclosed to DPHI is available to the facility In Stage 3 the volume of water required to process increased bird numbers will be supplemented by up to 30 ML (up to 59% of demand) recycled water provided by the Advanced Water Treatment Plant (to be constructed in Stage 3). Actual usage from each water source will depend on processing numbers each day, as this will determine whether it is most sustainable and responsible to either use the town water or to produce water via reverse osmosis in the Advanced Water Treatment Plant. The most sustainable approach will be dictated by various water stewardship factors, including social and environmental (including carbon emissions). However, assuming that the Advanced Water Treatment Plant was operating at maximum capacity, the recycled water available to the site would be up to 30ML/week. To ensure the best use of water resources and optimise overall environmental outcomes, it is not recommended that this is conditioned as the fixed amount per week.

As per the current approval (condition B27A), Stage 3 may involve off-site wastewater treatment services or recycling and is therefore subject to refinement and consideration of potential alternate solutions. As such, it is recommended that the modified SSD Consent will need to allow for submission of detailed design prior to DPHI for approval, prior to commencement of Stage 3. An update to the broader national and regional context which support the proposed development is also provided below. It is important to note that the project remains of vital importance to the national poultry industry and is critical to the expansion of production in the New England Region.

2.2 AUSTRALIAN POULTRY INDUSTRY CONTEXT

Research undertaken by the Australian Bureau of Agricultural and Resource Economics and Sciences (ABARES) indicates that total chicken meat consumption in Australia has increased by an average of 5% per annum over the 10 years to 2022-23, representing 45% of the total meat consumption. The ABARES commodities report shows that chicken continues to be the most consumed meat in Australia. As shown in ***Figure 7***, consumption of chicken meat

per person has increased by over 65% between 2000 (~30kg per person) and 2018 (~50kg per person), driven by the product's versatility, convenience and a lower price point compared to beef, lamb and pork. Per capita poultry consumption growth has continued reaching 50.2kg in 2023-24. As shown in ***Figure 8***, chicken meat production in Australia has grown steadily with growth forecast to continue.

As a result of this ongoing and predicted growth in demand for poultry meat products in Australia, significant expansion of the industry is required.

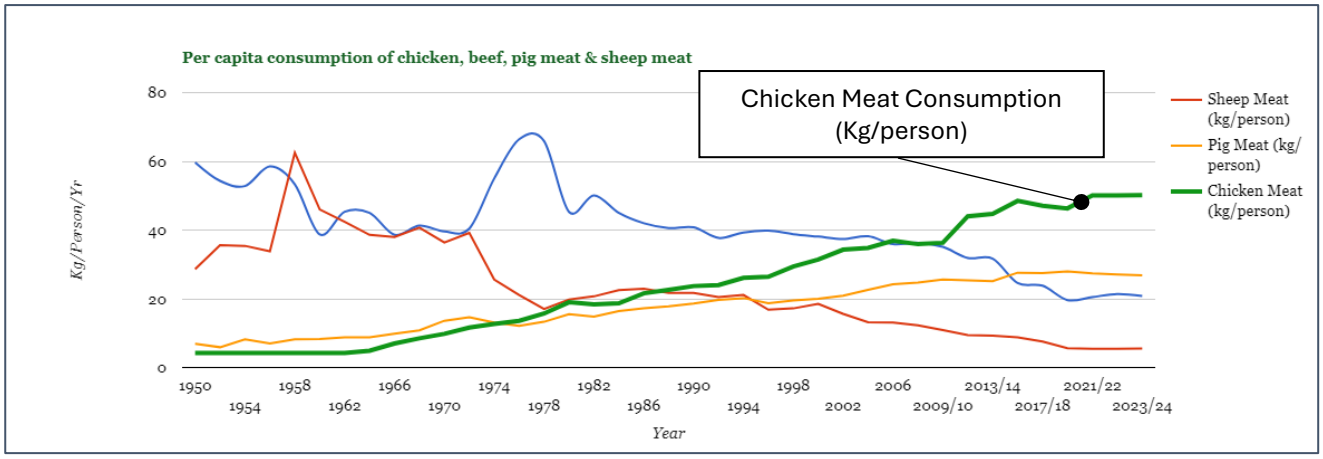


Figure 7: Consumption of Poultry Meat in Australia (ACMF, 2023)

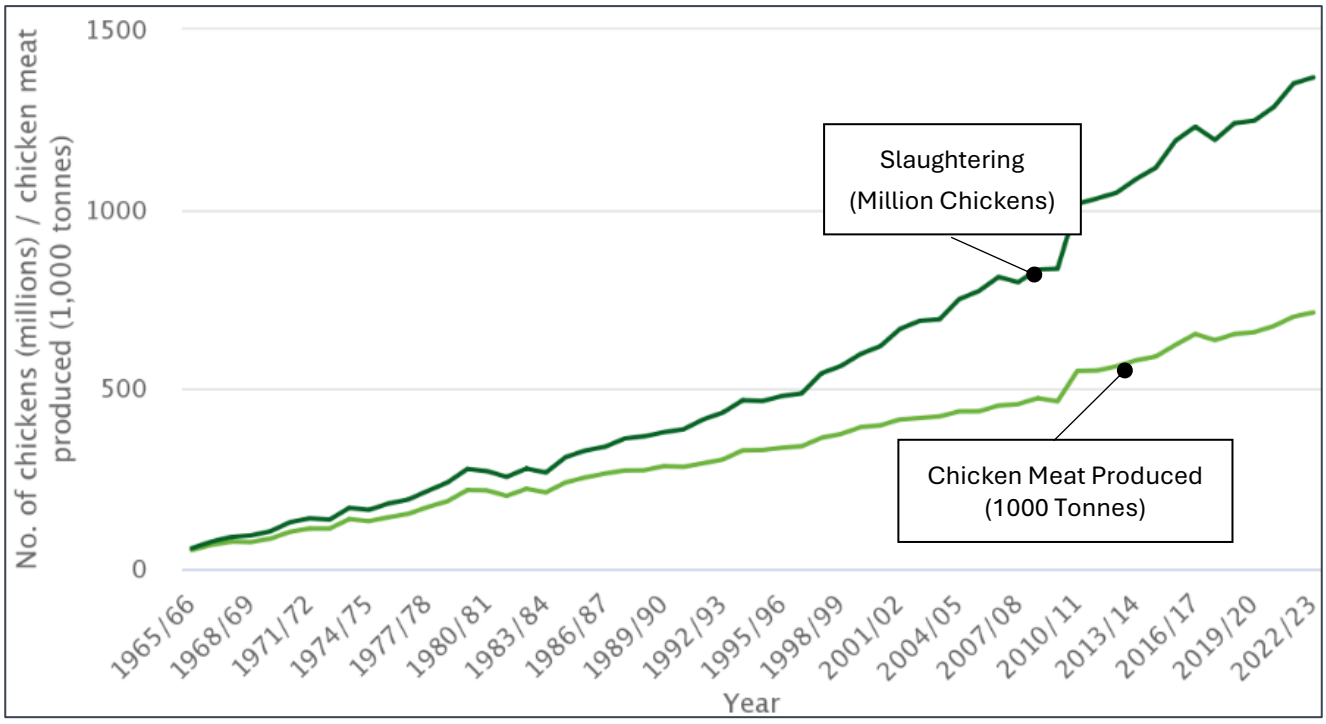


Figure 8: Chicken Meat Produced in Australia (ABARES, 2023)

2.3 REGIONAL CONTEXT

Existing operations within the New England Region processing of a maximum of 840,000 birds per week at the existing Out Street Processing facility. The current approval (SSD-9394-MOD-1) will facilitate the increase in poultry production to a maximum of 3 million birds per week.

Baiada sees the Tamworth region as being an ideal location for expansion and the increase in production capacity, to continue to supply poultry products to the Australian market. This is due to the existing accumulation of high value poultry assets and geographic, infrastructure and commercial attributes in the region which have created a poultry meat cluster. Examples of the attributes of this cluster include the following:

- Access to large quantities of locally grown grain including wheat and canola (typically sourced from Tamworth, Moree, Narrabri, Walgett and Gunnedah);
- Proximity to key NSW markets (including Sydney) and Southeast QLD and direct access to the State Road network;
- Ideal land types and topography for the construction of suitable shedding for poultry production;
- An ideal climate in terms of temperature and humidity for poultry production;
- Access to high quality water sources including bore water, dams, rivers and reticulated networks;
- Suitable sites for the location of poultry farms away grom sensitive receptors and population centres; and
- Support from existing major investment in infrastructure covering all facts of the integrated business.

This combination of factors is only present in a handful of areas across NSW and Australia which results in the long-term protection of the poultry industry in Tamworth being vitally important and the focus for infrastructure associated with the necessary expansion.

3 DESCRIPTION OF THE MODIFICATIONS

3.1 OVERVIEW

A comparison of the approved development and the proposed modification is provided in Table 2.

Table 2: Modified Project Summary Table

ISSUE	APPROVED DEVELOPMENT (AS MODIFIED)	PROPOSED MODIFICATION
Operations	Integrated Poultry Processing Facility including: • Poultry processing facility, with capacity to process up to 3 million birds a week. • Protein Recovery Plant, with capacity to render up to 1,680 tonnes of finished product per week. • Wastewater treatment plant. • Advanced water treatment plant. • Road connection to Workshop Lane. • Earthworks. • Connections to infrastructure.	Integrated Poultry Processing Facility including: • Poultry processing facility, with capacity to process up to 3 million birds a week. • Protein Recovery Plant, with capacity to render up to 1,680 tonnes of finished product per week. • Wastewater treatment plant. • Advanced water treatment plant. • Road connection to Workshop Lane. • Earthworks. • Connections to infrastructure. **(No Change)**
Proposed Gross Floor Area (Excluding Existing Buildings)	Poultry Processing facility: 35,085m^2 Administration and Amenities: 3,845m^2 Ancillary and WWTP buildings: 6,878m^2 **Additional GFA Proposed: 45,808m2**	Poultry Processing facility: 35,085m^2 Administration and Amenities: 3,845m^2 Ancillary and WWTP buildings: 6,878m^2 **Additional GFA Proposed: 45,808m2** **(No Change)**
Maximum Building Height	25.35m – High Bay Cold Storage Building	25.35m – High Bay Cold Storage Building **(No Change)**
Water Use	Consumption of 51ML of potable water per week. • Re-Use: 42 ML/Wk. • Tamworth Water: 9 ML/Wk.	Consumption of 51.2ML of potable water per week. • **Stage 1:** Tamworth Water: 12.75ML **Stage 2:** • Tamworth Water: 25.6ML **Stage 3:** • Tamworth Water: Up to 6.5ML/day • Recycled Water: Up to 6ML/day •
Wastewater Treatment	**Step 1 - Initial Design:**	**Stage 1: Transfer Out St to Oakburn discharge 9.6 ML/WK**

ISSUE	APPROVED DEVELOPMENT (AS MODIFIED)	PROPOSED MODIFICATION
	• Existing WWTP treating 4.5 ML / Wk as per current trade waste agreement. • Advanced Water Treatment Plant treating 21 ML/ Wk. **Step 2 – Ultimate Design**: • Advanced Water Treatment Plant treating 51 ML / Wk. **OR** • Transfer to Council's regional treatment facility if available.	• Retention of the existing Rendering Wastewater Treatment Plant as per current trade waste agreement (3.15ML / WK). • New on-site Wastewater Treatment Plant including a Covered Anaerobic Lagoon (CAL), Biological Nutrient Removal (BNR) System, Phosphorus Removal Plant Equalisation Tank, Dissolved Air Flotation Tank and Clear Well (9.6ML / WK) • Discharge of Processing wastewater as per existing TWAs. **Stage 2: Treating up to 25.6ML / WK** • Removal of the existing Rendering CAL and integration of Rendering Wastewater Treatment Plant, with the new Wastewater Treatment Plant. • Use of the on-site Wastewater Treatment Plant (constructed as Stage 1) treating up to 25.6 ML/week. • Transfer of treated wastewater (~21.2 ML/week) to Council's Wastewater Treatment facility for further treatment or recycling when available, or an alternate arrangement approved by the Planning Secretary. • New temporary TWA required with Council for approximately 12.73ML/week. **Stage 3: Treating up to 51.2ML / Week** • Expand Stage2 infrastructure. **AND** • Transfer of treated wastewater to an offsite Waste Water Treatment facility for further treatment or recycling when available. **OR** • Construction of an onsite Advanced Water Treatment Plant, which may include Brine Evaporation Lagoons and Brine Evaporation Plant, producing up to 6ML per day (equivalent to 30ML / Week/ 5 days of processing) of potable supply for re-use. **OR** • An alternate arrangement approved by the Planning Secretary.

ISSUE	APPROVED DEVELOPMENT (AS MODIFIED)	PROPOSED MODIFICATION
Traffic	408 trips per day	408 trips per day **(No Change)**
Parking	840 Parking Spaces (Increased from 820 as per MOD 3)	840 Parking Spaces **(No Change)**
Access	Extension to Workshop Lane	Extension to Workshop Lane **(No Change)**
Staff Numbers	1,176	1,176 **(No Change)**

3.2 DETAILED MODIFICATION DESCRIPTION

3.2.1 Approved Operations

Consistent with the original, modified approvals and pending approvals, the proposed Poultry Processing Facility will be housed within a new, large, modern industrial building situated immediately in front of the existing Rendering Plant, facing the Oxley Highway. The operation of the processing facility involves the delivery of live birds to the site which are then slaughtered, dressed and processed to produce the range of fresh and value-added poultry products available in the Australian supermarkets, restaurants and other food outlets. Following the completion of processing, the finished poultry products are packaged and moved into refrigerated storage areas and made ready for distribution by road transport. At full operation, the plant will have the capacity to process up to 3 million birds per week.

By-products generated in the production include of offal, blood and feathers. These valuable by-products are pumped or transported from the processing facility to the existing rendering plant which renders the materials to produce a range of protein-based products including various meals and tallow (up to 240 tonnes of finished products per day). As per the original / modified approval, no physical changes to the existing rendering plant building required beyond the provision of infrastructure (e.g. pipelines) to automatically deliver by-products from the proposed processing facility to the rendering facility.

In order to accommodate the estimated 1,176 full time staff at the site, a large administration and staff amenities building is to be constructed at the front of the processing facility will function as the main entrance for all staff and visitors to the site. Staff car parking will be accommodated via the construction of a car parking area located in front of the processing facility providing 820 spaces.

It is important to note that no change to these major components of the facility is proposed or required as part of this Modification Application. Further information in relation to these changes is provided below.

3.2.2 Modification to the Wastewater Treatment Plant

3.2.2.1 Overview

The approved wastewater treatment system involves a staged process whereby the necessary plant and equipment can be scaled up commensurate with production increases. Ultimately, the approved systems would enable wastewater generated by the processing plant to be treated on-site and returned for re-use.

Since approval of the modified project in May 2023, Baiada has proceeded with detailed design of the facility, commenced construction and is aiming to commence operations in mid-2026. The critical change with respect to this modification is a refined staging approach to delivery of the wastewater treatment plant on the site, which will

enable commencement of operations in the short term, expand the treatment process concurrently with production, and ultimately allow for advanced water treatment to occur either on or off site. The staging also reflects agreements reached with Council regarding the provision of potable water supply and wastewater services to the site.

In this regard, Stage 1 represents a transfer of the current trade waste allowances from the existing Out Street Poultry Processing Plant to Oakburn, which will not result in change to the current quantity of wastewater (12.8ML / WK) discharged to Council's Westdale Wastewater Treatment Plant (the Westdale WWTP) For Stage 1, the existing Rendering WWTP will continue to operate in accordance with its current trade waste agreement (discharging 3.15ML / WK) to the Westdale WWTP. A copy of the Trade Waste Agreement for trade waste discharge for Stage 1 is included as **Appendix 9.** Wastewater from processing will be treated at the new on-site Wastewater Treatment Plant including a Covered Anaerobic Lagoon (CAL), Biological Nutrient Removal (BNR) System, Phosphorus Removal Plant Equalisation Tank, Dissolved Air Flotation Tank and Clear Well (9.6ML / WK) before discharge to the Westdale WWTP.

Stage 2 will involve demolition of the existing rendering plant treatment lagoon (the existing CAL) and integration of the Rendering WWTP with the new on-site WWTP. Following treatment on site, treated waste water (25.6ML / WK) will be discharged as trade waste for further treatment at the Westdale WWTP. Commencement of Stage 2 will be subject to entry into a temporary Trade Waste Agreement with Council for the increased discharge volume.

Stage 3 involves expansion of Stage 2 infrastructure and construction of the Advanced Water Treatment Plant (including brine management solutions), which will have the capacity to return up to 30ML (6 ML/day) of advanced treated water for re-use on the site. Once Stage 3 is implemented, the wastewater discharged to the Westdale WWTP will be reduced to Stage 1 levels (12.8ML / WK).

Pursuant to commercially confidential agreements (provided separately to DPHI), town water in the amount disclosed to DPHI is available to the facility In Stage 3 the volume of water required to process increased bird numbers will be supplemented by up to 30 ML (up to 59% of demand) recycled water provided by the Advanced Water Treatment Plant (to be constructed in Stage 3). Actual usage from each water source will depend on processing numbers each day, as this will determine whether it is most sustainable and responsible to either use the town water or to produce water via reverse osmosis in the Advanced Water Treatment Plant. The most sustainable approach will be dictated by various water stewardship factors, including social and environmental (including carbon emissions). However, assuming that the Advanced Water Treatment Plant was operating at maximum capacity, the recycled water available to the site would be up to 30ML/week (6ML/day). To ensure the best use of water resources and optimise overall environmental outcomes, it is not recommended that this is conditioned as the fixed amount per week. A comparison between the approved and modified system proposed as part of this application is provided in **Table 3** below. A comparison of the approved and proposed approaches to wastewater treatment design, and physical layout plans is provided in ***Figure 9*** - ***Figure 12*** below. As demonstrated in ***Figure 11*** - ***Figure 12*** physically, the modified wastewater treatment plant is situated in generally in the same location as per the approved plan.

Table 3: Wastewater Treatment Modification - Summary Table

APPROVED WWTP / AWTP (AS MODIFIED)	PROPOSED WWTP
Step 1 - Initial Design: • Existing WWTP treating 4.5ML / Wk as per current trade waste agreement. • Advanced Water Treatment Plant treating 21 ML/ Wk. **Step 2 – Ultimate Design**: • Advanced Water Treatment Plant treating 51 ML / Wk. **OR** • Transfer to Council's regional treatment facility if available.	**Stage 1: Transfer Out St to Oakburn discharge 9.6 ML/WK** • Retention of the existing Rendering Wastewater Treatment Plant as per current trade waste agreement (3.15ML / WK). • New on-site Wastewater Treatment Plant including a Covered Anaerobic Lagoon (CAL), Biological Nutrient Removal (BNR) System, Phosphorus Removal Plant Equalisation Tank, Dissolved Air Flotation Tank and Clear Well (9.6ML / WK) • Discharge of Processing waste water as per existing TWAs. **Stage 2**: **Treating up to 25.6ML / WK**

APPROVED WWTP / AWTP (AS MODIFIED)	PROPOSED WWTP
	• Removal of the existing Rendering CAL and integration of Rendering Wastewater Treatment Plant, with the new Wastewater Treatment Plant. • Use of the on-site Wastewater Treatment Plant (constructed as Stage 1) treating up to 25.6ML/week. • Transfer of treated wastewater (~21.2 ML/week) to Council's Wastewater Treatment facility for further treatment or recycling when available, or an alternate arrangement approved by the Planning Secretary. • New temporary TWA Required with Council. **Stage 3: Treating up to 51.2ML / Week** • Expand Stage 2 infrastructure. **AND** • Transfer of treated wastewater to an offsite Waste Water Treatment facility for further treatment or recycling when available. **OR** • Construction of an onsite Advanced Water Treatment Plant, which may include Brine Evaporation Lagoons and Brine Evaporation Plant, producing up to 30ML / Week (6 ML/day) of potable supply for re-use. **OR** • An alternate arrangement approved by the Planning Secretary.

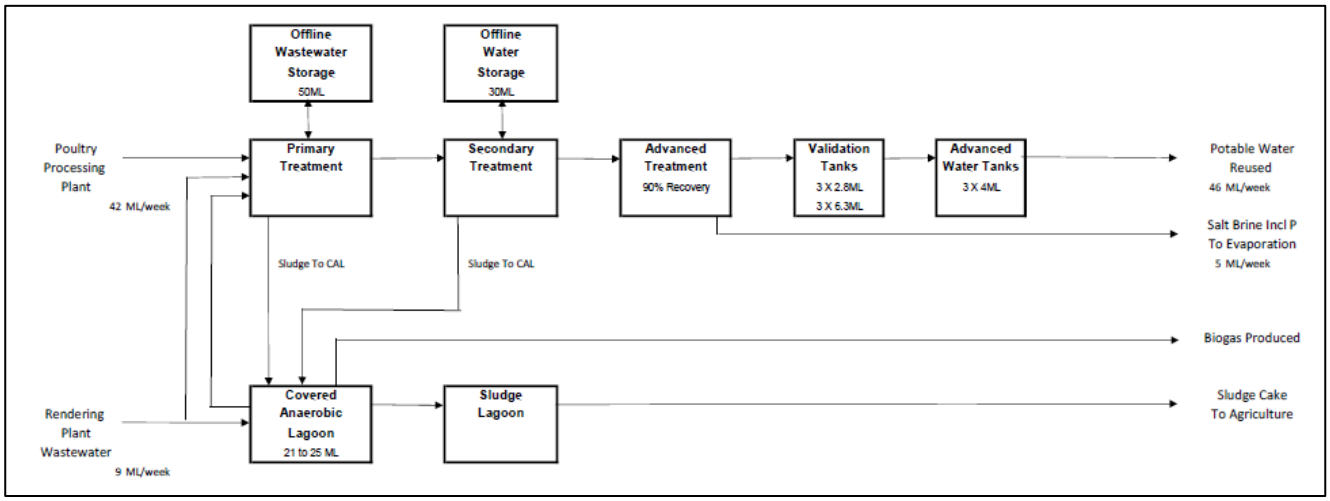


Figure 9: Step 2 Wastewater Treatment Design (As Approved)

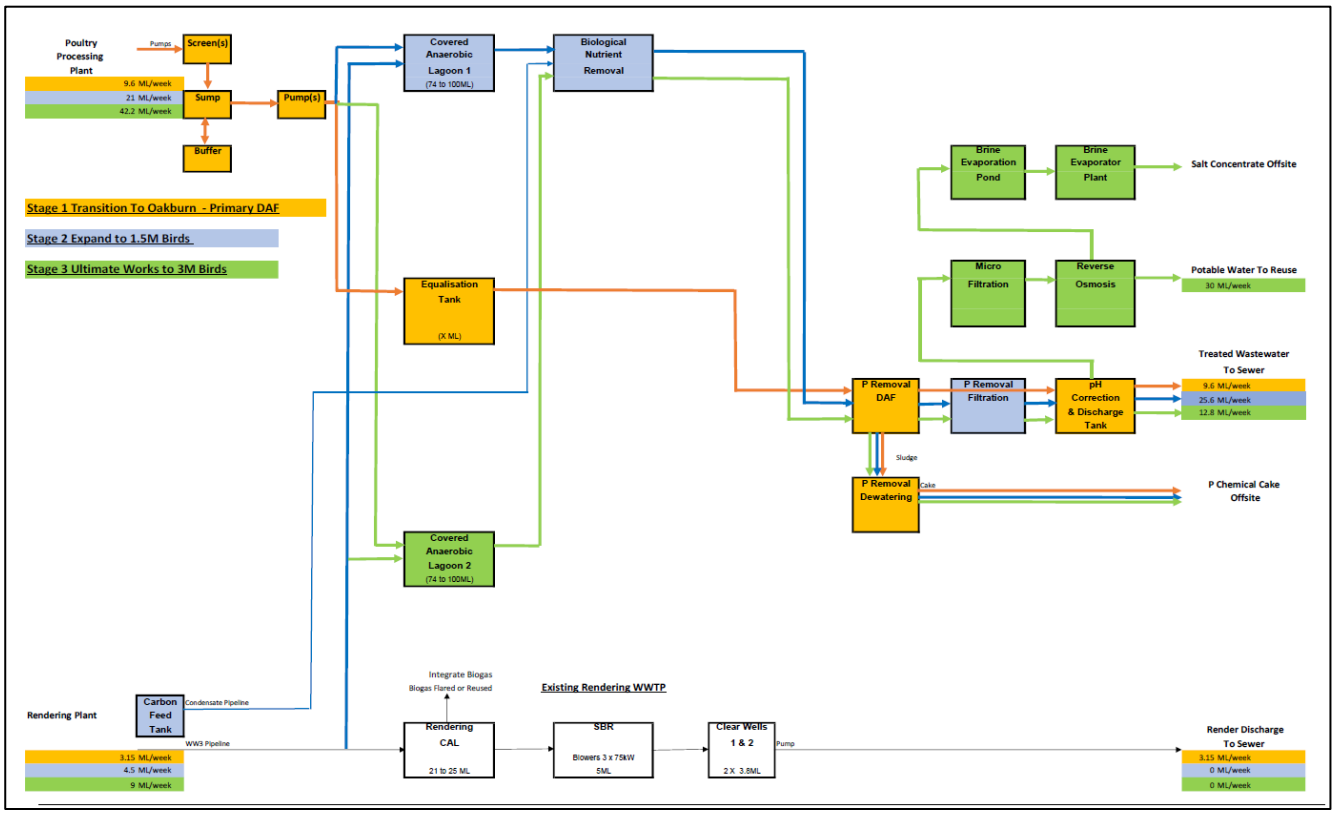


Figure 10: Staged Wastewater Treatment Design (Proposed Modification)

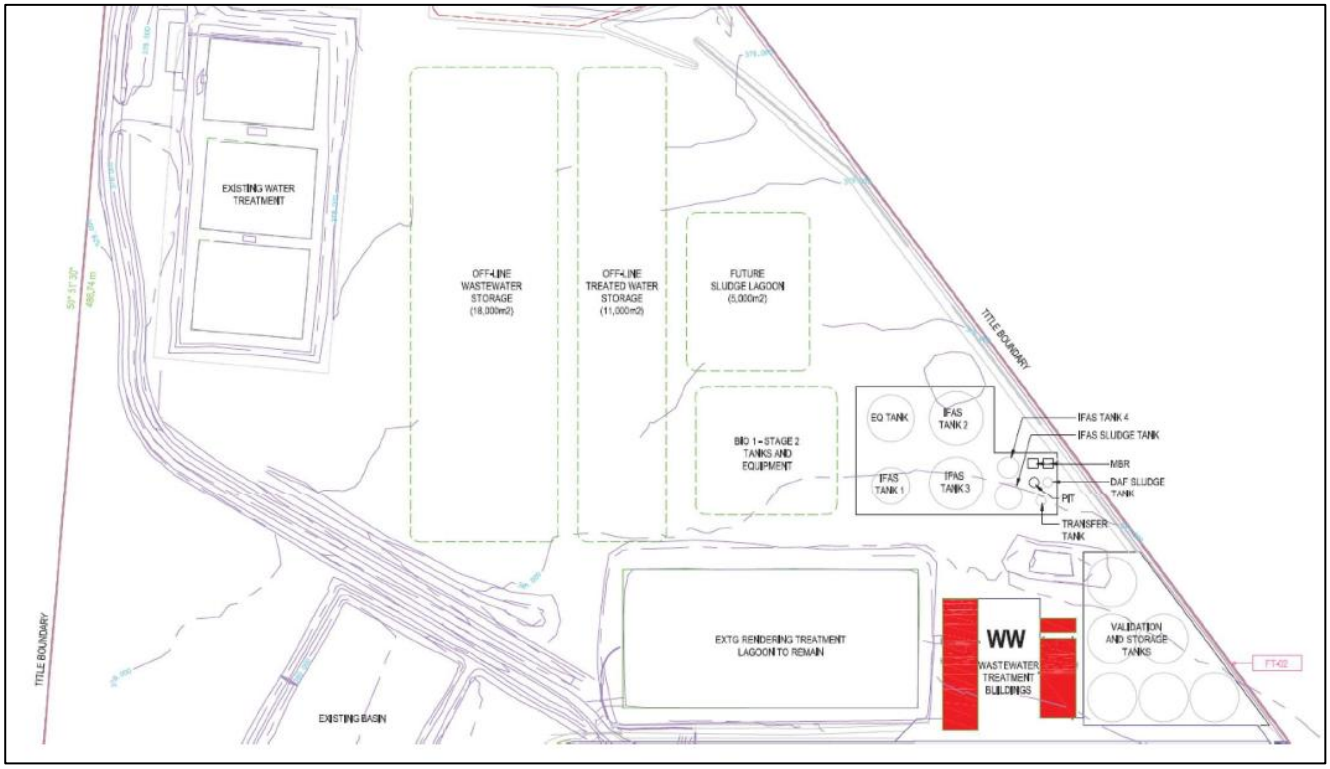


Figure 11: Concept Wastewater Treatment Plant Layout (As Approved)

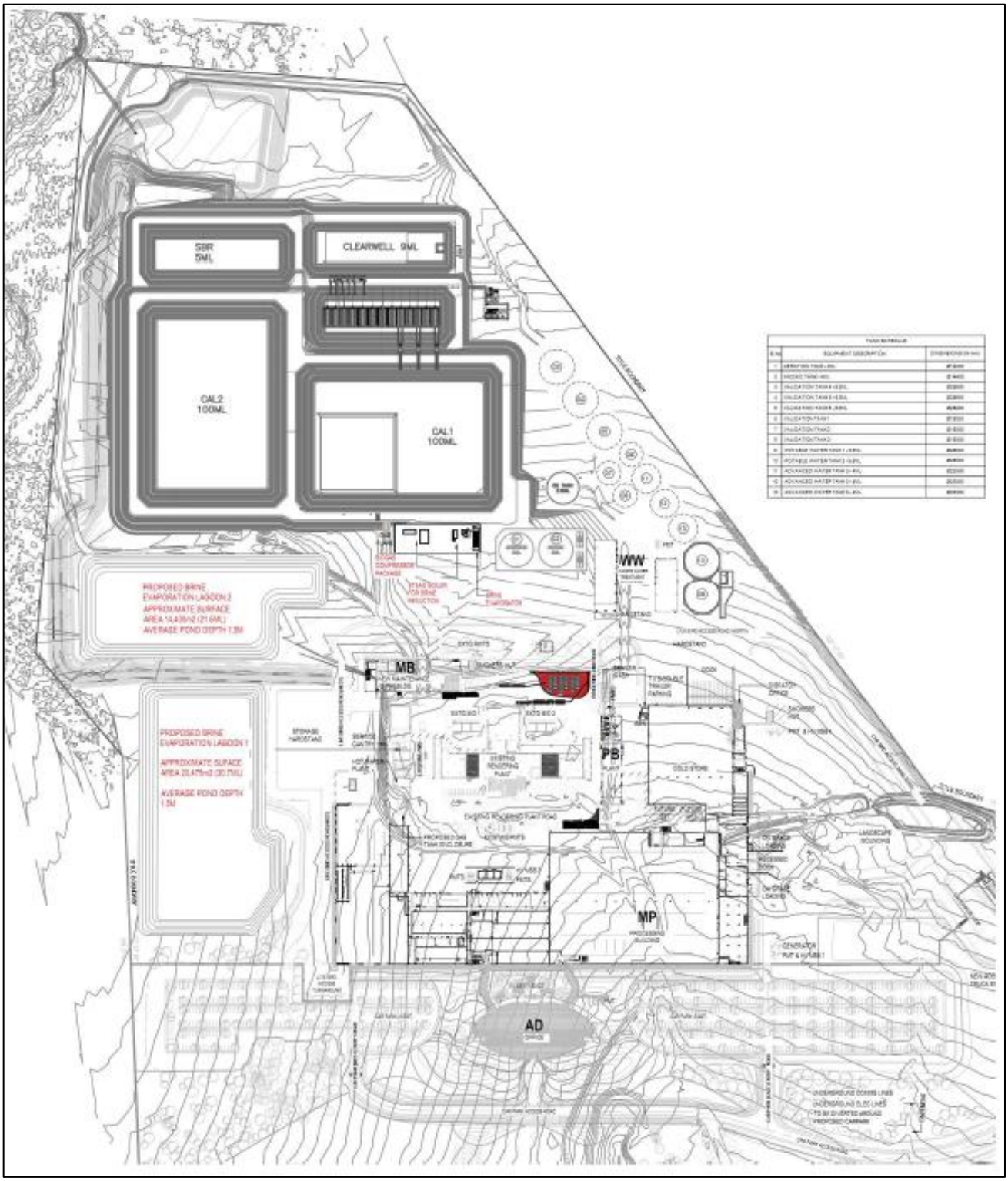


Figure 12: Stage (Concept Design) Wastewater Treatment Plant Layout (Indicative Only)

3.2.2.2 Treatment Regime

An updated Wastewater Concept Design Report has been prepared by JJC Engineering Pty Ltd and is included as **Appendix 3**. The proposed treatment regime is described below.

For Stage 1 and Stage 2, the wastewater treatment process will generally follow the followings steps:

- **Screening:** Screening will be undertaken at the processing plant, which involves passing the wastewater through the Contrashear screen to remove particles containing fat and protein that can be returned to

rendering, and recycled into protein meal and tallow. Screenings will be collected in bins, moved by a forklift to the rendering plant for processing.

- **Pumping:** Once screened, the wastewater is pumped via underground pipes to the wastewater treatment plant.
- **Covered Anaerobic Lagoons:** The proposed Covered Anaerobic Lagoons (CALs) are an enclosed anaerobic (oxygen-free) pond with a 2mm HDPE floating cover (or similar) that stores biogas and contains any odour. The wastewater is pumped from the processing plant into the CAL and in the absence of oxygen, anaerobic bacteria break down the organic materials. This process produces biogas as a byproduct which is used as a renewable energy source for the onsite gas boilers (or flared), thereby reducing the need to use natural gas.
- **Biological Nutrient Removal (BNR):** Wastewater from the CALs will be pumped to the BNR System where further reduction of organic load, nitrification of ammonia, and denitrification of nitrate/nitrite will occur. The BNR System treats wastewater in batches moving through aerobic and anoxic zones to treat the wastewater prior to discharge of the treated wastewater.
- **Phosphorus Removal:** Wastewater will be passed through a Phosphorus Removal Plant including a DAF to achieve the phosphorous levels required by Council.
- **Discharge Tanks / PH Correction:** Prior to final discharge to Council's sewer, the wastewater is passed through the discharge tank where pH is monitored and corrected as required. Once corrected, treated wastewater is to be pumped to Council's sewer or treated water collection system in accordance with the specifications of a Trade Waste Agreement.

For Stage 3, the concept Advanced Water Treatment Plant will be added to the water treatment process. Whilst the ultimate design and treatment processes are to be further developed, with the approval of the Planning Secretary to be obtained prior to implementation, it is envisaged to include the following elements.

- **Microfiltration:** After treatment in the biological process established in Stage 1 and 2, wastewater will flow through a fully automated ultrafiltration membrane for separation of fine solids, salts and pathogens from the effluent stream to minimise fouling of the reverse osmosis membranes, and ensure the water is safe for re-use in the processing plant.
- **Reverse Osmosis:** The Reverse Osmosis (RO) plant will function in a manner largely consistent with the plant that was originally approved on the site. The treated wastewater will move into the RO plant where it is forced them through a semi-permeable membrane under pressure and dosed / treated for removal of total dissolved solids (TDS). Again, water quality is subject to a fully automated monitoring process and is dosed or treated as required to ensure compliance with the water quality requirements.
- **Validation Tanks:** Once the water is treated by the AWTP, it is stored on site in a set of Validation Tanks as follows:
    - The first tank will receive the current day's output from the AWTP.
    - The second tank is full (filled the day before) and will require testing before use in processing plant.
    - The third tank was filled 2 days before was tested the previous day. This water is pumped to the advanced Water Tanks for use the in the processing plant.
- **Advanced Water Storage Tanks:** The Advanced Water Tanks will have a combined capacity of 12ML (three tanks each 4ML) and are intended to:
    - Provide contingency storage of water for the Processing Plant if Advanced Treatment is operating slowly or not at all.
    - Receive water supply from Tamworth Regional Council (TRC) when required.
    - Provide water supply to OPPP at a minimum flowrate and pressure.
- **Brine Evaporation:** The AWTP produces a concentrated brine stream which is stored in the Evaporation Lagoons. The Lagoons are fitted with a mechanical water evaporation system that pumps and atomizes water into fine droplets, forcing droplets into the atmosphere to evaporate more quickly. Concentrated brine from Evaporation Lagoons is pumped to a brine evaporation plant that boils the brine under vacuum

conditions. The plant then uses an air-cooled condenser to cool the resulting condensate which is then recovered for reuse. Once the desired crystal concentration is reached the slurry is withdrawn from the system for transport offsite for disposal. At full development approximated 150 Tonnes of salt concentrate will be produced per week.

Alternatively, the treated wastewater could be provided to an off-site Wastewater Treatment Facility for further treatment or recycling, subject to any necessary agreement being obtained from the external service provider, or an alternate arrangement approved by the Planning Secretary.

Due to options available for Stage 3, it is recommended that the modified SSD Consent will need to allow for submission of detailed design report to DPHI for approval, prior to commencement of Stage 3.

3.2.3 Wastewater Treatment Pond Design

The proposed wastewater treatment plant involves the construction of a series of wastewater treatment ponds located at the rear of the processing plant. These ponds will be "turkey nest" dam with a maximum depth of ~ 2.5m below existing ground level and a maximum height of ~5.0m above ground level. The ponds will be lined with a HDPE Liner (or similar material) to avoid any risk of wastewater seepage into the soil profile. The design of the proposed wastewater treatment ponds is shown in the Wastewater Report included as **Appendix 3.**

3.2.4 Minor Plan Modifications

Since the original approval and the approval of the previous Modifications, Baiada has proceeded with construction of the facility, which has resulted in minor changes to the built form and layout. These are largely in response to finalised equipment selections, input from fire engineers, and clarification of operational requirements. For completeness, these minor changes have been incorporated into the Modification Plans and include:

- Sprinkler Tanks and Pump House are provided in response to fire engineering requirements.
- Sodium Hypochlorite Tanks which have been shown/located on plans, consistent with locations submitted in SSD-9394-Mod-5.
- Citric Acid IBCs (Intermediate Bulk Containers) which have been shown/located on plans, consistent with locations submitted in SSD-9394-Mod-5.
- Hydronic Buffer Tank and pumps have been added to plans as required for hydraulic detailed design requirements, with no impact to Dangerous Goods.
- Sealed Petfood Storage Tanks providing a sealed area for storage of certain offal products which by-pass rendering and can be sold directly to pet foot producers.
- Staff Smokers Hut – provided external to the administration building.
- Weighbridge Bypass drive-way has been provided to enable safe movement of vehicles that are not required to pass over the weighbridge.
- Maintenance Building awning size reduced to meet functional requirements
- Electrical transformer added following detailed electrical design to align with equipment supply requirements

It is important to note that the design changes are minor and will not alter the poultry processing and rendering activities approved on site which remain unchanged (i.e. Processing of 3 million birds/week rendering up to 1,680 tonnes of finished products per week). It is also noted the changes to the location of the dangerous goods (citric Acid and Sodium Hypochlorite are already considered in updated Preliminary Hazards Assessment submitted as part of MOD-5 which is currently being assessed by DPHI.

The changes to the overall site plan are include in plans included as **Appendix 2.1**. As shown, the changes involve minor additions to the approved buildings and as such will have negligible impacts on the overall layout or operations of the facility remains substantially the same.

3.2.5 Infrastructure and Services

3.2.5.1 Water Supply

Pursuant to commercially confidential agreements (provided separately to DPHI), town water in the amount disclosed to DPHI is available to the facility

In Stage 3, the mains supply will be supplemented by up to 30 M (up to 59%) recycled water produced by the AWTP. It is important to note that Baiada is committed to reducing use or potable water supply and using recycled water, however a 90% reuse target is no longer required due to agreements with Council to supply potable water to the facility. Actual usage from each water source will depend on processing numbers each day, as this will determine whether it is most sustainable and responsible to either use the town water or to produce water via reverse osmosis in the Advanced Water Treatment Plant. The most sustainable approach will be dictated by various water stewardship factors, including social and environmental (including carbon emissions), which we have expanded on further below. However, assuming that the Advanced Water Treatment Plant was operating at maximum capacity, the recycled water available to the site would be up to 30ML/week (6ML/day). To ensure the best use of water resources and optimise overall environmental outcomes, it is not recommended that this is conditioned as the fixed amount per week

The sustainability factors that will influence the use of the available water sources include availability of supply, energy demand, carbon emissions and cost. These factors are further discussed below:

- **Carbon emissions:** Life cycle analysis show that carbon emissions associated with advanced water treatment of wastewater for potable reuse (including reverse osmosis as proposed at Oakburn), are typically higher than mains water supply due to significant additional energy, chemical uses, membrane production and disposal. In this regard, Zhang estimates that recycled water system generate 3.083 kg CO_2-eq/kL of potable water produced (Zang, 2023)[1]. In comparison, mains water is estimated to generate 0.46 kg CO_2e/kL for mains water supply (Skoczko 2025)[2].
- **Costs:** The additional costs to operate an advanced water treatment plant as opposed to receiving town water are attributable to increased capital and operating costs - including electricity, chemicals (coagulants, pH control, antiscalant, CIP etc), qualified wastewater operators, maintenance, brine disposal and sludge handling.
- **Availability of supply:** During times where mains supply is readily available, this water can be produced and more efficiently and sustainably and can be used in preference to recycled water. During dry periods, where supply is low or restrictions are enforced, Oakburn can rely more heavily on recycled water, ensure food security and supply of poultry products to the Australian Market can be maintained.

The revised treatment approach allows the operations to continually balance reducing carbon emissions, optimising water stewardship and addressing other contributing factors to maximise efficiency and overall sustainability.

3.2.5.2 Stormwater Management

An updated Stormwater Management Plan has been prepared by SCP and is included as **Appendix 4**. It is important to note that the catchment plan, previously developed by MPN Engineering is relevant as the catchments have not changed due to design changes on site.

The modifications to the proposed development will be carried out in a staged process. The updated Stormwater Management Plan considered both the construction and operation stages of the development. The Stormwater Management demonstrates that under the proposed concept plan, stormwater quality and quantity treatment is achievable to the levels required by Tamworth Regional Council and industry best management practice.

As per the previous approval, stormwater detention for the development will be provided in three detention basins located throughout the site to suit the sub-catchment. The detention basins will be over-sized to compensate for the

[1] Zhang, M., Yu, S., Shi, C., Wang, H., & Chang, N. (2023). Carbon footprint analysis and carbon neutrality potential of desalination by reverse osmosis for different applications based on life cycle assessment. Scientific Reports. Nature

[2] Skoczko, I. Energy Efficiency Analysis of Water Treatment Plants: Current Status and Future Trends. Energies 2025, 18, 1086. https://doi.org/10.3390/en18051086)

areas of the site which bypass detention. Stormwater treatment for the development will be provided by a series of swales located throughout the site.

The modifications to the design and staging of the updated WWTP will have no impact to the original catchments or broader stormwater management approach as there has been concerted effort to maintain the catchments and stormwater flow directions so to not change the existing catchment conditions and as such do not change the approved stormwater drainage concept and basin plans.

Accordingly, the previously approved stormwater management plan, catchment plan and associated mitigation and management measures are to remain in place as current.

3.2.5.3 Other infrastructure

There are no changes to other infrastructure connections proposed or required as part of this modification.

3.3 ADDITIONAL SUSTAINABILITY BENEFITS

The proposed modification to the wastewater treatment system on site will provide opportunities for additional sustainability benefits to be incorporated into the project. The introduction of the Covered Anaerobic Lagoon (CAL) to the wastewater treatment produces provides the opportunity to capture biogas produced by the breakdown of the wastewater stream. As per the existing rendering plant CAL, the biogas captured under the cover is collected and used in place of natural gas for boilers that produce hot water various processing activities. This approach reduced natural gas demand for the facility and the associated greenhouse gas emissions. Using the biogas directly onsite is the most efficient way to use biogas and more energy efficient than converting biogas to electricity.

As noted above, the production of advanced water generates approximately 85% more carbon emissions compared to mains water. The revised treatment approach allows the operations to continually balance reducing carbon emissions, optimising water stewardship and addressing other contributing factors to maximise efficiency and overall sustainability.

More broadly, Baiada is implementing a diverse range of sustainability across the entire company. Since 2010, Baiada has reduced emissions from energy consumption by 28% and are on track to meet the company target of a 50% reduction by 2030. This has been achieved through investments in biogas and solar energy to power suitable processing facilities, and improved energy efficiencies across all sites.

These initiative highlights Baiada's proactive and practical approach, ensuring that the company not only meets its operational needs but also contributes to a cleaner and more sustainable future. Once the current tranche of projects is completed, Baiada will review additional sustainability projects which may include further initiatives at Oakburn.

3.4 CAPITAL INVESTMENT VALUE

Wilde and Woollard has been requested to prepare an updated Capital Investment Value (CIV) Report for the revised project which is included as **Appendix 8**. As outlined in the report, the revised CIV for the project is $272,086,360 exclusive of GST, and as such, the project as modified remains State Significant Development.

3.5 EMPLOYMENT

As per the modification approval, at full operation the facility is expected to provide employment for large workforce of up to 1,176 people with the various areas of the processing facility. The proposed modifications will not alter the proposed staffing levels at full operation.

3.6 CONDITIONS TO BE MODIFIED

CONDITION	REQUIRED AMENDMENTS	JUSTIFICATION
Conditions B24 – B27	*Evaporation Ponds* ***(if required as part of Stage 3 of the Wastewater Treatment Plant).*** *B24. The evaporation ponds must have liners installed and maintained to achieve a hydraulic conductivity of 1x10-9 metres per second or less via a constructed clay liner of at least 1000 mm thickness (or a geosynthetic liner providing equivalent or better protection) or otherwise agreed with the EPA or the Planning Secretary.* *B25. The evaporation ponds must be designed to include, and maintain, a freeboard level of at least 500mm to meet the 7-day rare design rainfall depth for a 1 in 2,000 year-event of 480 mm.* *B26. Prior to the commencement of operation of the project, the Applicant must prepare an Evaporation Pond Management Plan to the satisfaction of the Planning Secretary. The Evaporation Pond Management Plan must form part of the OEMP required by condition C5. The Evaporation Pond Management Plan must:* *(a) be prepared by a suitably qualified and experienced engineer;* *(b) provide an updated water balance and risk mitigation measures to demonstrate that the design freeboard capacity of the evaporation ponds is restored as soon as practical after significant rainfall events and there is no cumulative storage above the freeboard;* *(c) identify contingency measures to prevent managed overflows; and* *(d) describe operational measures to be implemented for salt removal, maintaining liner integrity and maintaining the leak detection system performance.* *B27. Prior to the commencement of operation of the project, the Applicant must submit an Evaporation Ponds Commissioning Report to the Department and EPA that:* *(a) demonstrates the evaporation ponds have been constructed in consultation with a suitably qualified and experienced engineer;* *(b) demonstrates the liner achieves the specified hydraulic conductivity described in condition B24;* *(c) addresses the increased risk to groundwater contamination due to high salinity wastewater potentially reacting with the liner; and* *(d) includes groundwater monitoring requirements to detect potential pond leakage.*	The on-site AWTP requiring the evaporation ponds is proposed to be delivered as part of the Stage 3 of the Wastewater Treatment Plant.

CONDITION	REQUIRED AMENDMENTS	JUSTIFICATION
	B27A. The requirement to construct and operate the Evaporation Ponds and prepare the management plans as required under Conditions B24 to B27 may be waived, if the Applicant provides evidence, to the satisfaction of the Planning Secretary, that a formal agreement has been reached with a third party for the provision of off-site evaporation services that will accept reverse osmosis concentrate from the development. The Applicant must: *(a) ensure any request made to the Planning Secretary is accompanied with an endorsement from the EPA and Council; and* *(b) not operate that part of the project that is relevant to the reverse osmosis concentrate without the written approval of the Planning Secretary confirming it is satisfied a formal agreement for the provision of off-site evaporation services has been reached.*	
New Condition	**Stage 1: Transfer Out St to Oakburn discharge 9.6 ML/WK** • Retention of the existing Rendering Wastewater Treatment Plant as per current trade waste agreement (3.15ML / WK). • New on-site Wastewater Treatment Plant including a Covered Anaerobic Lagoon (CAL), Biological Nutrient Removal (BNR) System, Phosphorus Removal Plant Equalisation Tank, Dissolved Air Flotation Tank and Clear Well (9.6ML / WK) • Discharge of Processing waste water as per existing TWAs. **Stage 2**: **Treating up to 25.6ML / WK** • Removal of the existing Rendering CAL and integration of Rendering Wastewater Treatment Plant, with the new Wastewater Treatment Plant. • Use of the on-site Wastewater Treatment Plant (constructed as Stage 1) treating up to 25.6 ML/week. • Transfer of treated wastewater (~21.2 ML/week) to Council's Wastewater Treatment facility for further treatment or recycling when available, or an alternate arrangement approved by the Planning Secretary. • New temporary TWA Required with Council. **Stage 3**: **Treating up to 51.2ML / Week** • Expand Stage 2infrastructure. **AND** • Transfer of treated wastewater to an offsite Waste Water Treatment facility for further treatment or recycling when available.	As noted in this report, refined staging approach to delivery of the wastewater treatment plant on the site, which will enable commencement of operations in the short term, expand the treatment process concurrently with production, and ultimately allow for advanced water treatment to occur either on or off site. The staging also reflects agreements reached with Council regarding the provision of potable water supply and wastewater services to the site.

CONDITION	REQUIRED AMENDMENTS	JUSTIFICATION
	OR • Construction of an onsite Advanced Water Treatment Plant, which may include Brine Evaporation Lagoons and Brine Evaporation Plant, producing up to 30ML / Week of potable supply for re-use. **OR** • An alternate arrangement approved by the Planning Secretary.	
Appendix 1	***Amend Appendix 1 – Development Layout Plans.***	This condition is to be modified to reflect the modified development plans as follows: • **OVERALL SITE PLAN – SSDA (STAGE 1) - A502-TE-AR-DRG-SW-105-1 (NN).** • **OVERALL SITE PLAN – SSDA (STAGE 2) - A502-TE-AR-DRG-SW-105-2 (F).** • **OVERALL SITE PLAN – SSDA (STAGE 3) - A502-TE-AR-DRG-SW-105-3 (E).**
Appendix 4	***Amend Appendix 4 – Applicant's Management and Mitigations Measures.***	This condition is to be modified to reflect modified Management and Mitigation measures presented in Section 7.

3.7 MODIFICATION TYPE

3.7.1 Section 4.55 (1A) Modification

This modification application is submitted in accordance with Section 4.55 (1A) of the EP&A Act which indicates that a consent authority may modify the consent if—

a) It is satisfied that the proposed modification is of minimal environmental impact, and

b) It is satisfied that the development to which the consent as modified relates is substantially the same development as the development for which the consent was originally granted and before that consent as originally granted was modified (if at all), and

c) It has notified the application in accordance with –

i. The regulations, if the regulations so require, or

ii. A development control plan, if the consent authority is a council that has made a development control plan that requires the notification or advertising of applications for modification of a development consent, and

d) It has considered any submissions made concerning the proposed modification within any period prescribed by the regulations or provided by the development control plan, as the case may be.

3.7.2 Substantially the Same

The proposed development been assessed against the relevant matters for consideration pursuant to Section 4.55 (1A) of the EP&A Act. In particular, a consent authority may modify a Development Consent if it is satisfied that the development to which the consent as modified relates is substantially the same development as the development

for which consent was originally granted. In this regard, the proposed modification is substantially the same as the approval as:

- The modification to the wastewater treatment and advanced water treatment processes will not alter the 'essence' of the development as approved, and the development remains an integrated poultry processing facility.
- There is no change to approved processing volume of 3 million birds per week.
- There is no change to approved rendering volume of 1,680 tonnes of finished product per week.
- There is no change to the proposed processing and rendering activities to be undertaken on the site.
- There is no change to staff numbers required to operate the facility.
- Vehicle access to the facility is still provided by the approved connection to Workshop Lane.
- There is no change to traffic volumes, car parking numbers or heavy vehicle movements associated with the development.
- The modified WWTP system is generally located in the same area as the approved development at the rear of the processing plant.
- The refined staging approach to delivery of the wastewater treatment plant on the site, is proposed in response to the agreements reached with Council as the Water Supply Authority regarding the provision of potable water supply to the site, and trade waste discharge for Stage 1.
- The AWTP to be constructed in Stage 3 will return up to 30 ML of potable water for re-use within the processing plant which equates to 71% of the 42ML per week originally proposed. This change is in response to Tamworth Regional Council confirming that additional potable supply is available to the Applicant, which can be produced and supplied to the processing plant with a significant reduction in energy usage per litre compared to the AWTP.
- Additionally, the revised wastewater treatment process will facilitate the future supply of a renewable source of biogas via the Covered Anerobic Lagoon, which can offset approximately 33% of natural gas used in processing operations.
- The modified staging will enable commencement of operations in the short term, expand the treatment process concurrently with production, and deliver the advanced water treatment to facility within Stage 3.

3.7.3 Minimal Environmental Impact

As demonstrated in this Modification Report and the supporting documentation, the potential impacts associated with the amended wastewater treatment process for the site remain consistent with those previously forecast. Importantly, as per the original and modified consent, there are no impacts (e.g. noise, odour, traffic, stormwater etc) which exceed the appliable environmental standards or require additional mitigation or management actions beyond those originally prescribed.

With consideration of the proposed plans and the above factors, it is considered that in totality, the modified infrastructure is substantially the same as that which was approved and that the proposed changes will have minimal adverse environmental impacts.

4 STATUTORY CONTEXT

A brief overview of the key statutory requirements for the project is presented in Table 4 below.

Table 4: Statutory Requirements

MATTER	GUIDANCE
Power to Grant Consent	In accordance with section 2.6 and Schedule 1 of the *State Environmental Planning Policy (Planning Systems) 2021*, development is declared to be State Significant Development if it is listed in Schedule 1 of the SEPP. With respect to intensive Agricultural produce industries and food and beverage processing, this use is listed as SSD if it has an Estimated Development Cost (Formerly CIV) of more than $30 million. Wilde and Woollard has been requested to prepare an updated Capital Investment Value (CIV) Report for this modification which is included as **Appendix 8.** As outlined in the report, the updated CIV for the project is $272,086,360 exclusive of GST, and as such the project as modified remains State Significant Development. Under clause 4.5 of the *EPA Act 1979,* the Consent Authority for the SSD (including any modifications) is the Minister or the Independent Planning Commission.
Permissibility	Under the *Tamworth Regional Local Environmental Plan 2010,* the subject site is located in the RU1 Primary Production Zone. The existing and proposed development falls under Tamworth LEP definition of **Livestock Processing Industry** which means *"a building or place used for the commercial production of products derived from the slaughter of animals (including poultry) or the processing of skins or wool of animals, derived principally from surrounding districts, and includes abattoirs, knackeries, tanneries, woolscours and rendering plants"*. In accordance with clause 3 of the Tamworth LEP development of a Livestock Processing Industry located in the Primary Production Zone (RU1) is identified as development that is **Permitted with Consent.** The ancillary access road (via Workshop Lane) also traverses land included in the Special Activities (SP1) and Environmental Management (C3) zones (former E3 Zone). While a Livestock Processing Industry is identified as prohibited development within the SP1 zone, Section 4.38(3) of the *Environmental Planning and Assessment Act 1979* allowed for development consent to be granted for State Significant Development, despite the development being partly prohibited by an Environmental Planning Instrument (EPI). There is no change to the approved access road.
Other Approvals	***Protection of the Environment Operations Act 1997*:** The modified development involves a Premise Based Activity identified in Section 43 (b) of the *Protection of Environmental Operations Act 1997*, namely *Schedule 1 Item 23 Livestock processing activities*. The applicant is required to seek a variation to the current Environmental Protection License (EPL 1566) prior to an increase in rendering and commencement of poultry processing associated with this Development Application.

MATTER	GUIDANCE
	***Roads Act 1993*:** In accordance with Clause 2.122 of the *State Environmental Planning Policy (Transport and Infrastructure) 2021*, the Development Application must be referred to the RMS for comment as it involves development listed under Schedule 3 Traffic Generating Development.
Mandatory matters for consideration (See Table 5 below).	• Section 1.3 of the EP&A Act 1979 • Section 4.55 (1A) of the EP&A Act 1979 • Section 4.15 of the EP&A Act 1979 • *State Environmental Planning Policy (Biodiversity and Conservation) 2021 - Chapter 3 Part 3.2* • *State Environmental Planning Policy (Resilience and Hazards) 2021 - Chapter 3 Part 3 s3.12* • *State Environmental Planning Policy (Resilience and Hazards) 2021 - Chapter 4 s4.6* • *State Environmental Planning Policy (Transport and Infrastructure) 2021 Chapter 2 Part 2.3 Division 17*

Table 5: Mandatory matters for Consideration

STATUTORY REFERENCE	MANDATORY CONSIDERATION	SECTION IN EIS
Consideration under the Act and Regulation		
Section 1.3	Relevant objectives of the Act • to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources, • to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment, • to promote the orderly and economic use and development of land, • to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats, • to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),	All
Section 4.15	**Relevant environmental planning instruments:** • *State Environmental Planning Policy (Planning Systems) 2021 – Chapter 2 s2.6* • *State Environmental Planning Policy (Biodiversity and Conservation) 2021 - Chapter 3* • *State Environmental Planning Policy (Resilience and Hazards) 2021 - Chapter 3 Part 3 s3.12*	6.1.1

STATUTORY REFERENCE	MANDATORY CONSIDERATION	SECTION IN EIS
	• *State Environmental Planning Policy (Resilience and Hazards) 2021 - Chapter 4 s4.6* • *State Environmental Planning Policy (Transport and Infrastructure) 2021 Chapter 2 Part 2.3 Division 17* • Tamworth LEP 2010 **The likely impacts of that development:** • including environmental impacts on both the natural and built environments, and social and economic impacts in the locality • the suitability of the site for the development • the public interest	6. 8.
Mandatory Relevant Considerations under EPI		
State Environmental Planning Policy (Resilience and Hazards) 2021 - Chapter 3 Part 3 s3.12	Consideration of the potential changes to the Preliminary Hazard Analysis associated with the Modified Development.	6.9
State Environmental Planning Policy (Resilience and Hazards) 2021 - Chapter 4 s4.6	Consideration of the whether the land is contaminated, and (b) if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out.	6.1.1
Consideration under other Legislation		
Biodiversity Conservation Act 2016	The requirement for an additional BDAR for the Modified Development.	6.2.1
EPBC Act 1999	The potential for significant impacts on Matters of National Environmental Significance (MNES).	6.2.2

5 ENGAGEMENT

This section outlines the consultation activities undertaken to inform the scope of this modification application.

5.1 CONSULTATION

5.1.1 Government Consultation

5.1.1.1 Tamworth Regional Council

Subsequent to approval of the original application, and increasingly following the additional Modifications, the Applicant has been in negotiations and discussions with Tamworth Regional Council regarding this application to confirm potable water supply to the site, and enter into a Trade Waste Agreement for Stage 1. Beyond Stage 1, the Applicant has confirmed the proposed staged approach for water supply and wastewater treatment with Council.

5.1.1.2 Other Agencies

Due to the minor nature of the modification and minimal impact on the approved operations, consultation with governmental departments has not been undertaken prior to lodgement.

5.1.2 Community Consultation

The original SSD only received 3 public submissions (2 local companies supporting the project, and 1 objection from PETA) and there were no submissions received in response to notification of MOD-1. Given this modification relates only to the changes to the wastewater treatment process for the site, and recycled water will ultimately be provided to the site, broader consultation with the surrounding community has not been undertaken as part of this Modification Application.

As demonstrated within this report and the supporting technical studies, the proposed changes to the approved development will not result in any increase to forecast impacts of the development on sensitive receptors or intensification of approved activities on the site. As such, it is considered that the legislative notification of the modification will be sufficient to provide any additional feedback concerning the modified development.

6 ASSESSMENT OF IMPACTS

6.1 ENVIRONMENTAL PLANNING INSTRUMENTS

6.1.1 State Environmental Planning Policies

An assessment of the proposed development against the relevant State Environmental Planning Policies (SEPPs) it provided in **Table 6**.

Table 6: SEPP Compliance Table

STATE ENVIRONMENTAL PLANNING POLICY (PLANNING SYSTEMS) 2021	
CHAPTERS	**ASSESSMENT & COMPLIANCE**
Chapter 2 - State and Regional Development	**Not applicable** – In accordance with Section 2.6 and Schedule 1 of the *State Environmental Planning Policy (Planning Systems) 2021*, development is declared to be State Significant Development if it is listed in Schedule 1 of the SEPP. With respect to intensive Agricultural produce industries and food and beverage processing, this use is listed as SSD if it has an Estimated Development Cost (formerly CIV) of more than $30 million. Wilde and Woollard has been requested to prepare a Capital Investment Value (CIV) Report for the revised project which is included as **Appendix 8**. As outlined in the report, the revised CIV for the project is $272,086,360 exclusive of GST, and as such, the project as modified remains State Significant Development. Under clause 4.5 of the EPA Act 1979, the Consent Authority for the SSD (including any modifications) is the Minister or the Independent Planning Commission.
Chapter 3 - Aboriginal Land	**Not applicable** – The Modification Application is not located on and owned by an Aboriginal Land Council.
Chapter 4 – Concurrences and Consents	**Not applicable** – There are no concurrences of consents described in Chapter 4 applicable to the Modification Application.
STATE ENVIRONMENTAL PLANNING POLICY (BIODIVERSITY AND CONSERVATION) 2021	
CHAPTERS	**ASSESSMENT & COMPLIANCE**
Chapter 2 – Vegetation in Non-Rural Areas	**Not applicable –** The modified development is not in a non-rural area.
Chapter 3 – Koala Habitat Protection 2020	**Applicable** – Chapter 3 Applies to assessment of the Modification Application. The proposed modifications to WWTP are located within the parts of the site previously considered within the approved BDAR.

STATE ENVIRONMENTAL PLANNING POLICY (PLANNING SYSTEMS) 2021	
	Chapter 3 Applies to assessment of the Modification Application. As outlined in the updated BDAR submitted with MOD 4, the presence of Koala's and potential habitat was the considered in detail as part of the original previous assessment. Nocturnal surveys, Koala SAT searches, and motion sensor cameras did not identify the presence of Koalas on-site. As such, the minor modification proposed in this application are not expected to result in and any additional or significant direct or indirect impacts on Koalas and algins with the requirements of Chapter 3.
Chapter 4 – Koala Habitat Protection 2021	**Not applicable** – The modified development is located within the RU1 Zone and within the Tamworth Regional Council Area.
Chapter 5 – River Murray Lands	**Not applicable** – The modified development is not located within the River Murray Lands area.
Chapter 13 – Strategic Conservation Planning	**Not applicable** – The modified development is not located within a Strategic Conservation Planning Area.
STATE ENVIRONMENTAL PLANNING POLICY (RESILIENCE AND HAZARDS) 2021	
CHAPTERS	**ASSESSMENT & COMPLIANCE**
Chapter 2 - Coastal Management	**Not applicable** - The subject site is not within a coastal zone.
Chapter 3 - Hazardous and Offensive Development	**Applicable** – A Preliminary Hazards Assessment was submitted as part of the previous Modification Application (MOD-5) which is currently being assessed by DPHI. There is no change to the type, volume, or storage of any other dangerous goods identified in MOD-5, proposed or required as part of this Modification Application. With consideration of these factors, an updated PHA is not considered necessary as part of this Modification Application. All existing conditions, recommendations, management and mitigation measures, associated with the storage and use of dangerous goods will continue to be adopted by for the modified project.
Chapter 4 - Remediation of Land	**Applicable –** A detailed Contaminated Site Assessment Report was prepared by SMK Consultants and submitted with the original development application to determine if the there was any contamination on the subject site. The investigation took into consideration the characteristics of the site, historical land uses and adjoining land uses when analysing potential sources of contamination. This

STATE ENVIRONMENTAL PLANNING POLICY (PLANNING SYSTEMS) 2021	
	investigation did not identify any contamination of concern within the property boundary of the "Oakburn" Development site. PFAS was detected within the watercourse sediment of Lot 101 to the east of the processing site. The PFAS was identified at a concentration below adopted investigation threshold levels for human health or ecological screening. The PFAS chemicals are considered at trace levels in the sediment retained in a small gully dam within the adjoining Council land. This trace PFAS concentration is considered most likely to occur onsite because of lateral migration from the upstream registered PFAS contaminated site, mainly the Tamworth Regional Airport. This migration pathway is not expected to impact directly upon the proposed poultry plant development site. No physical contact pathways are present between the gully and the development site, other than during a period where the proposed access road would be constructed. The assessment concluded that the development site does not contain contaminated land that would impact construction of the Oakburn Processing facility or pose an unacceptable risk to human health or the surrounding environment. The modified development has resulted in minimal change to development footprint and as such, the original contamination assessment and associated management and mitigation measures remain fit for purpose for the modified development.

STATE ENVIRONMENTAL PLANNING POLICY (TRANSPORT AND INFRASTRUCTURE) 2021	
CHAPTERS	**ASSESSMENT & COMPLIANCE**
Chapter 2 - Infrastructure	**Applicable.** **Division 17:** In accordance with Clause 2.122 of the *State Environmental Planning Policy (Transport and Infrastructure) 2021*, the Development Application must be referred to the TfNSW for comment as it involves development listed under Schedule 3 Traffic Generating Development. As per the existing approvals, a new access road has been constructed linking the processing facility to Workshop Lane. As part original submission, a Road Transport Assessment was prepared by The Transport Planning Partnership (dated 20 June 2019) which demonstrated that with the traffic changes forecast to result from the processing facility, the key intersections would continue to operate at good levels of service. As noted, the forecasts assume a "worst case" in which the peak traffic generated by the processing facility would coincide with the on-street peak conditions, which is unlikely to occur. Nevertheless,

STATE ENVIRONMENTAL PLANNING POLICY (PLANNING SYSTEMS) 2021	
	the results indicate that sufficient capacity is available at the intersections under such conditions. As there are no changes to processing activities and the total traffic volumes proposed as part of this modification, the findings from the original Road Transport Assessment remain fit for purpose for the modified development.
Chapter 3 - Educational Establishments and Childcare Facilities	**Not applicable** – The modified development does not involve educational establishments or childcare facilities.
Chapter 4 - Major Infrastructure Corridors	**Not applicable** – The modified development does not involve a major infrastructure corridor.
Chapter 5 - Three Ports-Port Botany, Port Kembla and Newcastle	**Not applicable** – The modified development is not located in any of the three ports.
Chapter 6 - Moorebank Freight Intermodal Precinct	**Not applicable** – The modified development is not located in the Moorebank Freight Intermodal Precinct.
STATE ENVIRONMENTAL PLANNING POLICY (INDUSTRY AND EMPLOYMENT) 2021	
CHAPTERS	**ASSESSMENT & COMPLIANCE**
Chapter 2 - Western Sydney Employment Area	**Not applicable** – The modified development is not located within the Western Sydney employment area.
Chapter 3 - Advertising and Signage	**Not applicable** – The modified development does not require advertisement or signage.
STATE ENVIRONMENTAL PLANNING POLICY (RESOURCES AND ENERGY) 2021	
CHAPTERS	**ASSESSMENT & COMPLIANCE**
Chapter 2 – Mining, Petroleum Production and Extractive Industries	**Not applicable** – The modified development is for a poultry farm.
Chapter 3 - Extractive Industries	**Not applicable** – The modified development does not involve extractive industries.
STATE ENVIRONMENTAL PLANNING POLICY (PRIMARY PRODUCTION) 2021	
CHAPTERS	**APPLICABILITY**

STATE ENVIRONMENTAL PLANNING POLICY (PLANNING SYSTEMS) 2021	
Chapter 2 - Primary Production and Rural Development	**Not applicable.** The modified project does not involve primary production or rural development regulated by Chapter 2.
Chapter 3 - Central Coast Plateau Areas	**Not applicable.** The modified project is not located in the Central Coast Plateau Area.

STATE ENVIRONMENTAL PLANNING POLICY (PRECINCTS – EASTERN HARBOUR CITY) 2021	
CHAPTERS	**APPLICABILITY**
All	**Not applicable.** The modified project is not located in a listed State Significant Precinct.

STATE ENVIRONMENTAL PLANNING POLICY (PRECINCTS – CENTRAL RIVER CITY) 2021	
CHAPTERS	**APPLICABILITY**
All	**Not applicable.** The modified project is not located in a listed State Significant Precinct.

STATE ENVIRONMENTAL PLANNING POLICY (PRECINCTS – WESTERN PARKLAND CITY) 2021	
CHAPTERS	**APPLICABILITY**
All	**Not applicable.** The modified project is not located in a listed State Significant Precinct.

STATE ENVIRONMENTAL PLANNING POLICY (PRECINCTS - REGIONAL) 2021	
CHAPTERS	**APPLICABILITY**
All	**Not applicable.** The modified project is not located in a listed State Significant Precinct.

STATE ENVIRONMENTAL PLANNING POLICY (SUSTAINABLE BUILDINGS) 2021	
CHAPTERS	**APPLICABILITY**
All	**Not applicable.** The modification of the approved development does not require assessment against the SEPP.

6.1.2 Local Environmental Plans

6.1.2.1 Zoning and Permissibility

As shown in **Figure 13** Under the *Tamworth Regional Local Environmental Plan 2010,* the subject site is located in the RU1 Primary Production Zone. The objectives for the RU1 Primary Production Zone are as follows:

- *To encourage sustainable primary production by maintaining and enhancing the natural resource base.*
- *To encourage diversity in primary industry enterprises and systems appropriate for the area.*
- *To minimise the fragmentation and alienation of resource lands.*
- *To minimise conflict between land uses within this zone and land uses within adjoining zones.*
- *To permit subdivision only where it is considered by the Council to be necessary to maintain or increase agricultural production.*
- *To restrict the establishment of inappropriate traffic generating uses along main road frontages.*
- *To ensure sound management of land which has an extractive or mining industry potential and to ensure that development does not adversely affect the extract industry.*
- *To permit development for purposes where it can be demonstrates that suitable land or premises are not available elsewhere.*

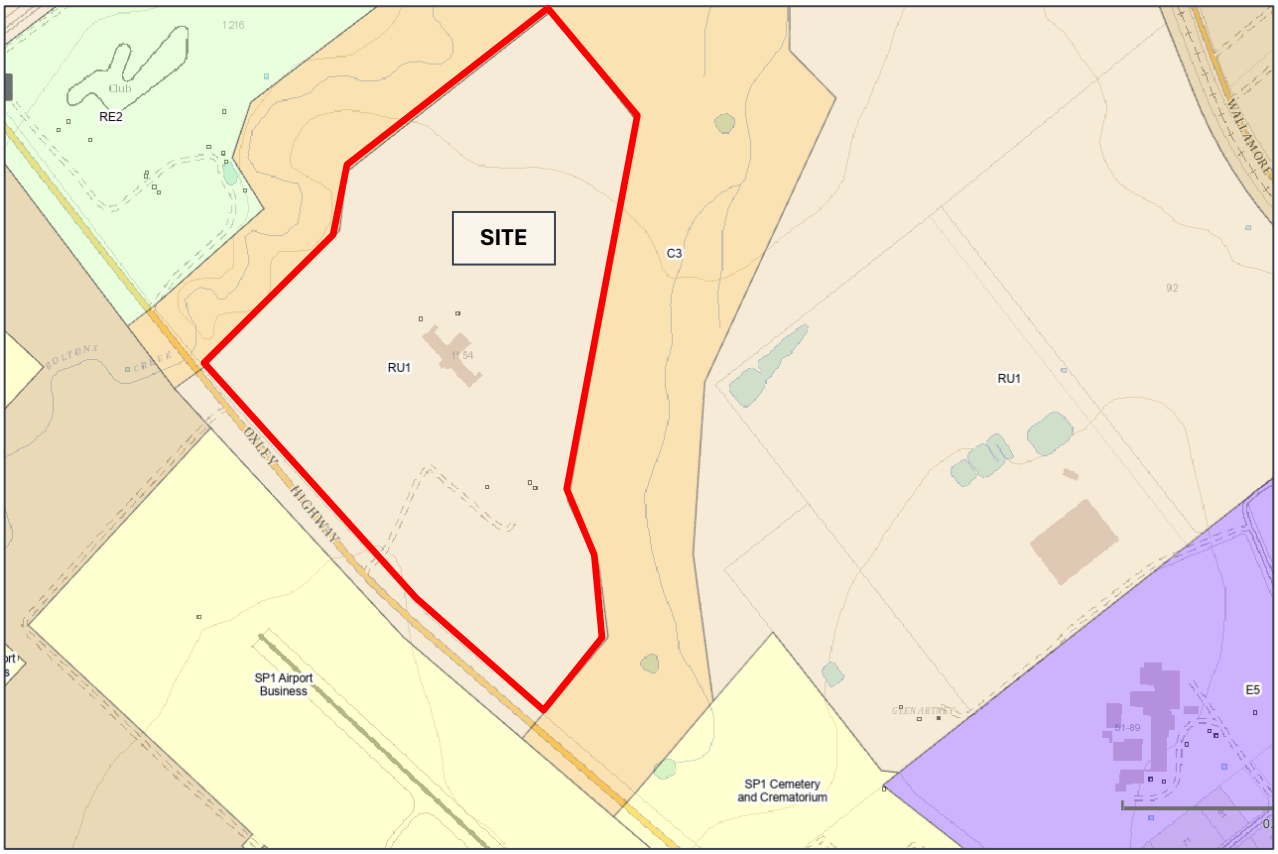


Figure 13: Zoning Plan (Tamworth Regional LEP, 2010)

The existing and proposed development falls under Tamworth LEP definition of **Livestock Processing Industry** which means *"a building or place used for the commercial production of products derived from the slaughter of animals (including poultry) or the processing of skins or wool of animals, derived principally from surrounding districts, and includes abattoirs, knackeries, tanneries, woolscours and rendering plants."*

In accordance with Clause 3 of the Tamworth LEP development of a Livestock Processing Industry located in the Primary Production Zone (RU1) is permitted with consent.

The site is located in food production hub which contains a number of major rural industries including a livestock exchange, beef abattoir, lamb abattoir, flour mill, other industrial operations and intensive animal husbandry. As such, the existing, approved and proposed use of the site is considered to be a complementary land use to the surrounding area and adjoining zones. Further, the development of the Oakburn Poultry Processing facility will support expansion of primary industry enterprises across the region and accordingly aligns with the objectives for the zone.

The ancillary access road (via Workshop Lane) also traverses land included in the Special Activities (SP1) and Environmental Management (C3) zones (former E3 Zone). While a Livestock Processing Industry is identified as prohibited development within the SP1 zone, Section 4.38 (3) of the *Environmental Planning and Assessment Act 1979* allowed for development consent to be granted for State Significant Development, despite the development being partly prohibited by an Environmental Planning Instrument (EPI). There is no change to the access road proposed as part of this Modification.

The proposed modification only involves amendments to the WWTP arrangements on the site and as such, the use remains consistent with zone objectives.

6.1.3 Principal Development Standards

There are no applicable principal development standards identified in Part 4 of the LEP applicable to the development.

6.1.4 Other Clauses

Other assessment provisions considered include in Table 7 below.

Table 7: Tamworth Regional LEP 2010 Assessment Provisions

PROVISION	APPLICABILITY AND RESPONSE
MISCELLANEOUS PROVISIONS	
5.1 Relevant acquisition authority	Not Applicable.
5.2 Classification and reclassification of public land	Not Applicable.
5.3 Development near zone boundaries	Not Applicable. The development does not rely on Clause 5.3.
5.4 Controls relating to miscellaneous permissible uses	Not Applicable.
5.5 Controls relating to secondary dwellings on land in a rural zone	Not Applicable.
5.8 Conservation of fire alarms	Not Applicable.
5.10 Heritage conservation	Not Applicable. The subject site is not identified as a heritage conservation area.
5.11 Bush fire hazard reduction	Not Applicable.

PROVISION	APPLICABILITY AND RESPONSE
5.12 Infrastructure development and use of existing buildings of the Crown	Not Applicable.
5.13 Eco-tourist facilities	Not Applicable.
5.16 Subdivision of, or dwellings on, land in certain rural, residential or environment protection zones	Not Applicable.
5.17 Artificial waterbodies in environmentally sensitive areas in areas of operation of irrigation corporations	Not Applicable.
5.18 Intensive livestock agriculture	Not Applicable. The development does not involve intensive livestock agriculture.
5.19 Pond-based, tank-based and oyster aquaculture	Not Applicable.
5.20 Standards that cannot be used to refuse consent – playing and performing music	Not Applicable.
5.21 Flood planning	Not Applicable. Current flood mapping in the area indicates the site is not subject to flooding from any sources. With respect to overland stormwater flows, an updated stormwater management plan (**Appendix 4**) has been prepared which demonstrates that the proposed modification application to the site will ensure there is no worsening impacts on the downstream receiving environment.
ADDITIONAL LOCAL PROVISIONS (AS APPLICABLE)	
7.1 Earthworks	**Complies.** The proposed development will require earthworks to create a level building pad poultry processing facility and associated infrastructure. There is minimal change to the extent of earthwork proposed or required as a result of this modification. With respect to overland stormwater flows, an updated Stormwater Management Plan (**Appendix 4**) has been prepared which demonstrates that the proposed modification to the site will ensure there is no worsening impacts on the downstream receiving environment.

PROVISION	APPLICABILITY AND RESPONSE
7.6 Development in flight path	**Complies.** The approved and modified development does not involve any construction which exceeds the Obstacle Height Limits (OLS) prescribed along the frontage of the site. With respect to aircraft safety, as part of the previous modification (SSD9394-MOD1) SLR Consulting Australia Pty Ltd prepared a Windshear and Wake Turbulence Assessment as well as a Glint and Glare Assessment in support of the application which demonstrated that the building complies with all relevant statutory requirements and will not result in unacceptable impacts on airport operations. There are no aspects of proposed modification which result in changes to the project beyond what was previously assessed on the site.

6.1.5 Tamworth Regional Blueprint 100

The proposed development is consistent with the strategic priorities outlined within the Tamworth Regional Blueprint 100 (LSPS 2020). Notably, it directly contributes to Action 3.4 under the Strategic priority to create a prosperous region which is to *'Substantially increase Tamworth's meat and food processing capacity'*.

The document recognises that Tamworth is the *'the centre for the production of and processing of beef, lamb and poultry products for supply to the whole of New South Wales. The proximity of grain, livestock, feedlots, sale yards and processing facilities provide a competitive advantage to producers in the sector. This sector has significant potential to expand its meat processing capacity and increase its expertise in providing high-tech agribusiness solutions' (Tamworth Regional Blueprint 100, pg27).*

The proposed development will capitalise on the existing accumulation of high value poultry assets and geographic, infrastructure and commercial attributes in the region which have created the existing poultry meat cluster.

6.1.6 Namoi Regional Jobs Precinct

In May 2025, the State Government released the Draft Namoi Region Jobs Precinct documents which is aimed at identifying options for attracting investment in intensive livestock agriculture and secondary agriculture processing the Namoi Regional Job Precinct through the application of supportive planning controls.

Baiada's current livestock operations within Tamworth facilitate processing of a maximum of 840,000 birds per week at the existing Out Street Processing facility. The Oakburn Poultry Processing Facility will increase production capacity to 3 million birds a week and requires significant increases in all aspects of the poultry cluster including an additional 300 additional poultry sheds, within a 2-hour drive of the site. As such, the approved and modified development closely aligns with the intent of the Namoi Regional Jobs Precinct.

Of note and particular relevance to this Modification, the strategy acknowledges that "*Water Reuse and Recycling Water is arguably the key risk or limiting factor for agricultural growth and security across the Namoi Region. Future approaches to water utilisation must include appropriate measures for both recycling and reincorporation to industries as well as dedicated environmental flows. The term 'wastewater' will disappear in the near term and be replaced with recycled or treated, thus water that goes on to other uses. The level of treatment should be minimised to meet the needs of the subsequent use (e.g., water destined for field irrigation would likely have a higher nutrient profile than that for environmental flow) and well managed approaches will enable water to be reused in multiple processes.*"

The refined staging approach to delivery of the wastewater treatment plant on the site, is proposed in response to the agreements reached with Council regarding the provision of sustainable potable water supply to the site, and trade waste discharge for Stage 1. The modified staging will enable commencement of operations in the short term, expand

the treatment process concurrently with production, and ultimately allow for advanced water treatment to occur either on site producing approximately 30 ML of recycled water per week (in Stage 3).

6.2 OTHER LEGISLATIVE CONSIDERATIONS

6.2.1 Biodiversity Conservation Act 2016

The Biodiversity Conservation Act 2016 (BC Act) requires that an SSD application must be accompanied by a Biodiversity Development Assessment Report (BDAR) unless the determining authority (DPHI) is satisfied that the modification to the approved Oakburn Poultry Processing Facility will not increase the impact on biodiversity values.

As part of the preceding Modification (MOD-4) an updated BDAR has been approved which provided for the following:

- Removal of an additional 0.3 ha of box gum woodland (PCT3397 which was reclassified from PCT599) and retaining 0.57 ha.
- Removal of an additional 0.10 Ha of planted natives and retaining 0.86 ha.
- The remaining development footprint to be contained within exotic dominated pasture areas, garden beds and cleared areas, which was exempt from the Biodiversity Offsets Scheme (BOS).
- Expansion of approved development footprint / impact areas to include all parts of the site excluding the 1.43 ha of retained PCT and planted natives, to enable ancillary construction works, services and infrastructure to be delivered without contravening the approved BDAR footprint.

In particular, a small patch of native vegetation at the rear of the processing plant was required to be removed to facilitate construction of the waste water treatment plant and connecting infrastructure.

The measures to avoid and minimise impacts to the biodiversity values of the subject land were addressed in the updated BDAR and included consideration of the project location, design and possible alternative locations. The potential direct and indirect impacts of the Project were also addressed as well as potential mitigation measures have been proposed to minimise impacts have been proposed.

The amended WWTP design for Stages 1 and 2 is located within the impact footprint as proposed in the approved BDAR (MOD-4) and as such, no additional impacts beyond what are currently being considered in the preceding Modification are forecast. The AWTP design for Stage 3 is conceptual only and detailed design will aim to avoid the BDAR area; if not possible modification of the BDAR approval will be sought.

6.2.2 EPBC Act 1999

The *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) requires approval from the Commonwealth Minister for the Environment, for any actions that may have a significant impact on Matters of National Environmental Significance (MNES). The previous Modification (MOD-4) identified that the development was unlikely to have a significant impact on MNES, due to the location of the development within the existing cleared and highly distributed parts of the property. The amended WWTP design for Stages 1 and 2 is located within the impact footprint as proposed in the Updated BDAR (MOD-4) and as such, no additional impacts on Matters of National Environmental Significance, beyond what is currently being considered in the preceding Modification are forecast. The AWTP design for Stage 3 is conceptual only and detailed design will determine if MNES will be impacted. If any MNES is significantly impacted, the necessary approvals will be sought.

6.3 SOILS AND GEOLOGY

As part of the detailed design process for the WWTP and other aspects of the development, additional geotechnical investigations have been completed on the site. As shown in ***Figure 14***, targeted investigations have been undertaken across the rear of the property to ensure suitability the ground conditions of the site, for the various components of the WWTP. The findings of these investigations have been taken into account in determining the final location, and design of the WWTP and associated ponds. A copy of the Additional Geotechnical Investigation undertaken by JK Geotechnics is included as **Appendix 7**.

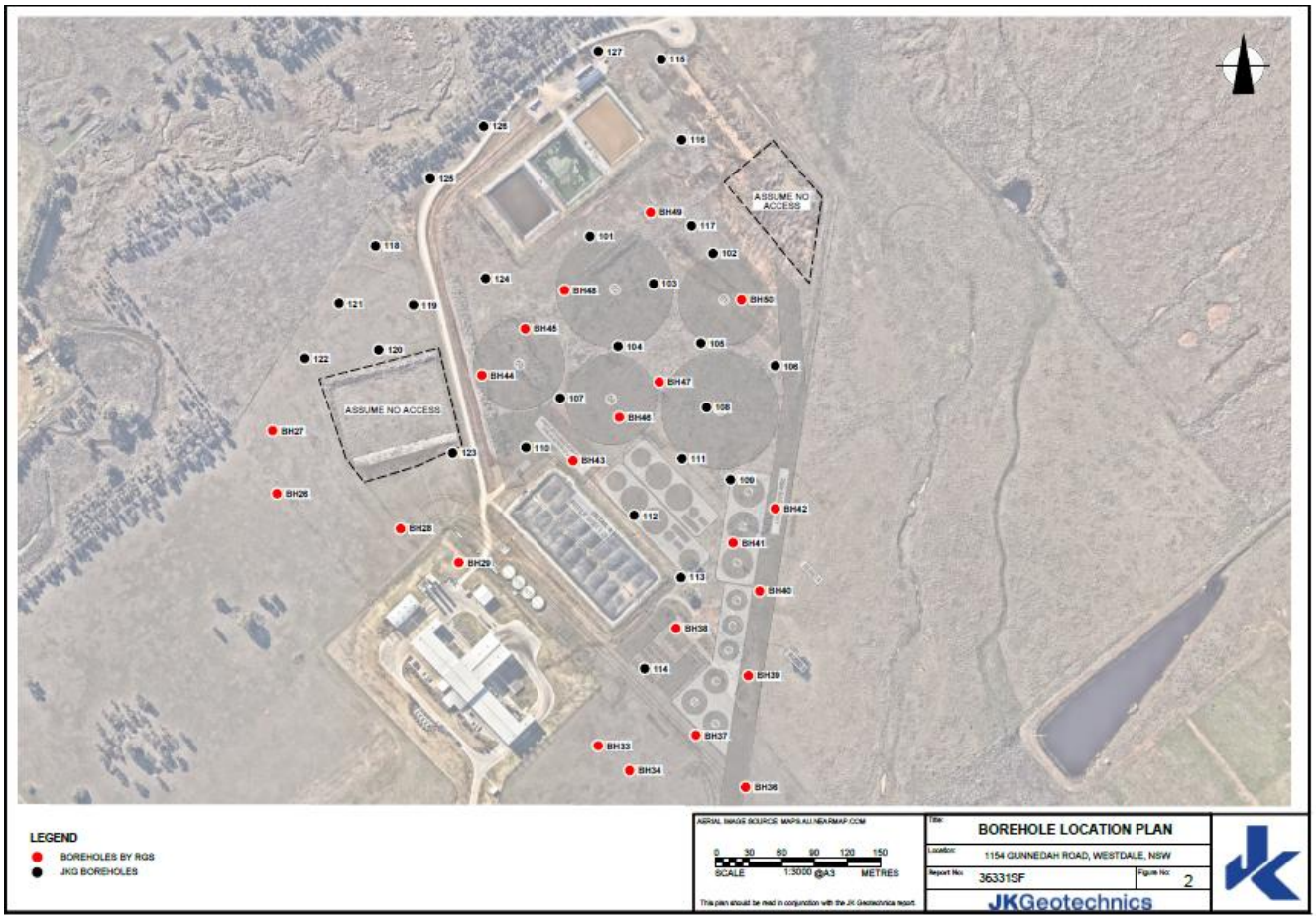


Figure 14: Geotechnical Testing Undertaken (JK Geotechnics, 2024)

6.4 ECOLOGICAL IMPACT

The Biodiversity Conservation Act 2016 (BC Act) requires that an SSD application must be accompanied by a Biodiversity Development Assessment Report (BDAR) unless the determining authority (NSW Planning in this instance) is satisfied that the modification to the approved Oakburn Processing Facility will not increase the impact on biodiversity values.

As part of the preceding Modification (MOD-4) an updated BDAR has been approved which provided for the following:

- Removal of an additional 0.3 ha of box gum woodland (PCT3397 which was reclassified from PCT599) and retaining 0.57 ha.
- Removal of an additional 0.10 Ha of planted natives and retaining 0.86 ha.
- The remaining development footprint to be contained within exotic dominated pasture areas, garden beds and cleared areas, which was exempt from the Biodiversity Offsets Scheme (BOS).
- Expansion of approved development footprint / impact areas to include all parts of the site excluding the 1.43 ha of retained PCT and planted natives, to enable ancillary construction works, services and infrastructure to be delivered without contravening the approved BDAR footprint.

In particular, a small patch of native vegetation at the rear of the processing plant was required to be removed to facilitate construction of the wastewater treatment plant and connecting infrastructure.

The measures to avoid and minimise impacts to the biodiversity values of the subject land were addressed in the updated BDAR and included consideration of the project location, design and possible alternative locations. The potential direct and indirect impacts of the Project were also addressed as well as potential mitigation measures have been proposed to minimise impacts have been proposed.

The amended WWTP design for Stages 1 and 2 is located within the impact footprint as proposed in the approved BDAR (MOD-4) and as such, no additional impacts beyond what are currently being considered in the preceding

Modification are forecast. The AWTP design for Stage 3 is conceptual only and detailed design will aim to avoid the BDAR area; if not possible modification of the BDAR approval will be sought.

6.5 HISTORIC AND CULTURAL HERITAGE

6.5.1 Previous Assessment

A Cultural Heritage Assessment for Historic Heritage and Aboriginal Cultural Heritage Assessment dated 22 January 2019 was prepared by Everick Heritage Consultants and submitted with the original EIS. As a result of the desktop study and field inspection the following conclusions were established with Sites Officer Christopher Fermor of the Tamworth LALC.

- No Indigenous cultural heritage sits or objects were identified within the lands subject to the Baiada (Tamworth) Pty Ltd Oakburn Poultry Processing Plan Development Application.
- It is understood that site previously identified with the Project Area have been subject to salvage under an AHIP.
- Consultation with Tamworth LALC through the Site Officers found no places or desktop history of Aboriginal 'intangible' cultural heritage on the site or association with spiritual or mythological stories or places elsewhere.
- The Project Area was found to be highly disturbed in a manner which constitutes 'disturbance' within the meaning of the Due Diligence Code and is consistent with the Due Diligence Code.
- The high degree of disturbance with regular slashing over the proposed Processing facility including carpark and roads has allowed for high levels of ground visibility and extensive areas where the surface is clearly visible, which lead to a high degree of confidence in the effectiveness of the survey and the conclusion as to the absence of Aboriginal cultural heritage.
- Due to the effectiveness of the survey, it is believed that there are no areas considered to contain potential archaeological deposits of significant Aboriginal heritage, such that they warrant additional archaeological investigation or in-situ conservation as a heritage protection zone.
- The proposed route of the Workshop Lane easement has been positioned to avoid any channelling of the Boltons Creek tributary thus diminishing the likelihood of encountering subsurface Aboriginal objects such as artefacts.

No items or places of potential historic heritage significance were located within the Project Area therefore Everick Heritage Consultants advised that a significance assessment was not required for the project.

6.5.2 Updated Assessment Results

As a result of the previous assessments and salvage operations undertaken on the site and taking into account the minimal changes to the development footprint proposed as part of this modification application, an updated Cultural Heritage Assessment was not prepared or required as part of this modification application.

6.5.3 Management and Mitigation Measures

All existing conditions, recommendations, management and mitigation measures, associated with the protection of historic and cultural heritage, including unexpected finds protocols will continue to be adopted by for the modified project.

6.6 AIR QUALITY

6.6.1 Previous Assessment

As part of the previous modification (SSD9394-MOD1), The Odour Unit (TOU) was engaged to prepare an Odour Impact Assessment (OIA) in accordance with the NSW EPA Guidelines. The OIA assessment was carried out using the CALPUFF Modelling System with use of odour emissions estimates based upon measurements collected by TOU at Oakburn PRP, Baiada Hanwood Processing facility and at the Out Street, Tamworth abattoir. All on-site odour

sources were assessed and modelled as separate groups (Protein Rendering Plant, Processing facility and the Wastewater Treatment Plant) as well as cumulatively. The cumulative assessment modelling (white contour) is shown in ***Figure 15*** below.

As demonstrated in the previous assessment, the results show that the predicted cumulative odour impact for existing rendering plant, poultry processing facility and wastewater treatment plant was below the NSW EPA odour IAC of 5ou at all sensitive receptors. The cumulative 5ou contour encroaches beyond the site boundary marginally to the north and marginally to the south. Therefore, it has been found that the proposed development is unlikely to cause adverse odour impacts under normal conditions.

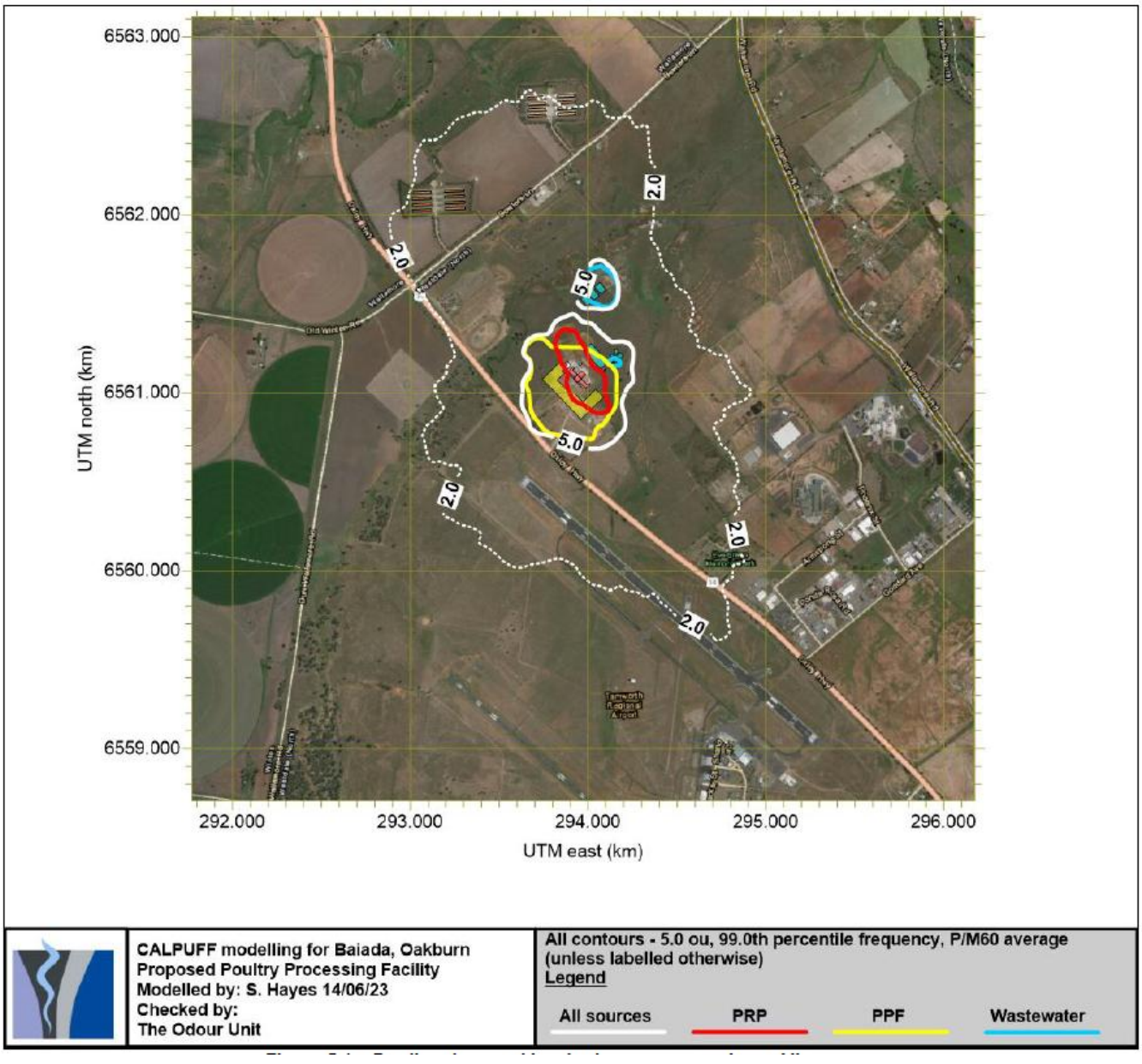


Figure 15: Previous Assessment - Projected ground level odour concentrations - All sources

6.6.2 Updated Assessment Results

Given the changes to the wastewater treatment regime on the site, an updated OIA has been prepared by TOU and is included as **Appendix 5**. The updated odour modelling has been undertaken to reflect the staged upgrades to the wastewater treatment plant as proposed as part of this modification. The project ground level odour concentrations of the modified Oakburn Processing Plant including the progressive upgrades to the WWTP- Stage 1 (White), Stage 2 (Red) and Stage 3 (Yellow) are shown in ***Figure 16***. As shown, the Stage 1 concentrations are expected to be

temporarily higher than subsequent stages which will include the Covered Anaerobic Lagoons (CALs) which will significantly reduce odour emissions from the site.

The updated modelling shows that while the change to wastewater treatment regime has increased the odour footprint of the operation, however, the predicted odour impacts from all sources of the Oakburn Poultry Processing Plant remains compliant with the NSW EPA odour IAC of 5 ou at the nearest sensitive receptors at all stages.

It is important to note that the modelling has assumed that emissions from the revised biological treatment systems are equivalent to previous modelling. This assumption is considered conservative as a BNR system provides a more stable and lower-odour operating profile than a SBR system which it will replace. Unlike an SBR, which operates in discrete fill, aeration, and settling phases that inherently produce short-duration emission peaks, the BNR process runs as a continuous-flow system with stable anoxic–aerobic cycling, internal recirculation, and no batch-related fluctuations. These characteristics substantially reduce both the magnitude and variability of odour emissions.

Additionally, the upgraded WWTP incorporates significantly enhanced containment system through the use of covered CALs (99.9% biogas capture), an enclosed DAF system, advanced treatment steps, and the absence of exposed biologically active surfaces downstream of the BNR. Collectively, these engineering system controls indicate that the actual steady-state emissions from the revised WWTP will be much lower than those associated with the previous SBR-based design. However, for the purpose of the modified modelling, TOU have applied odour emissions equivalent to earlier versions - despite the more advanced and inherently lower-emitting treatment configurations now being adopted. As such, the updated modelling is considered to be a conservative representation of likely emissions.

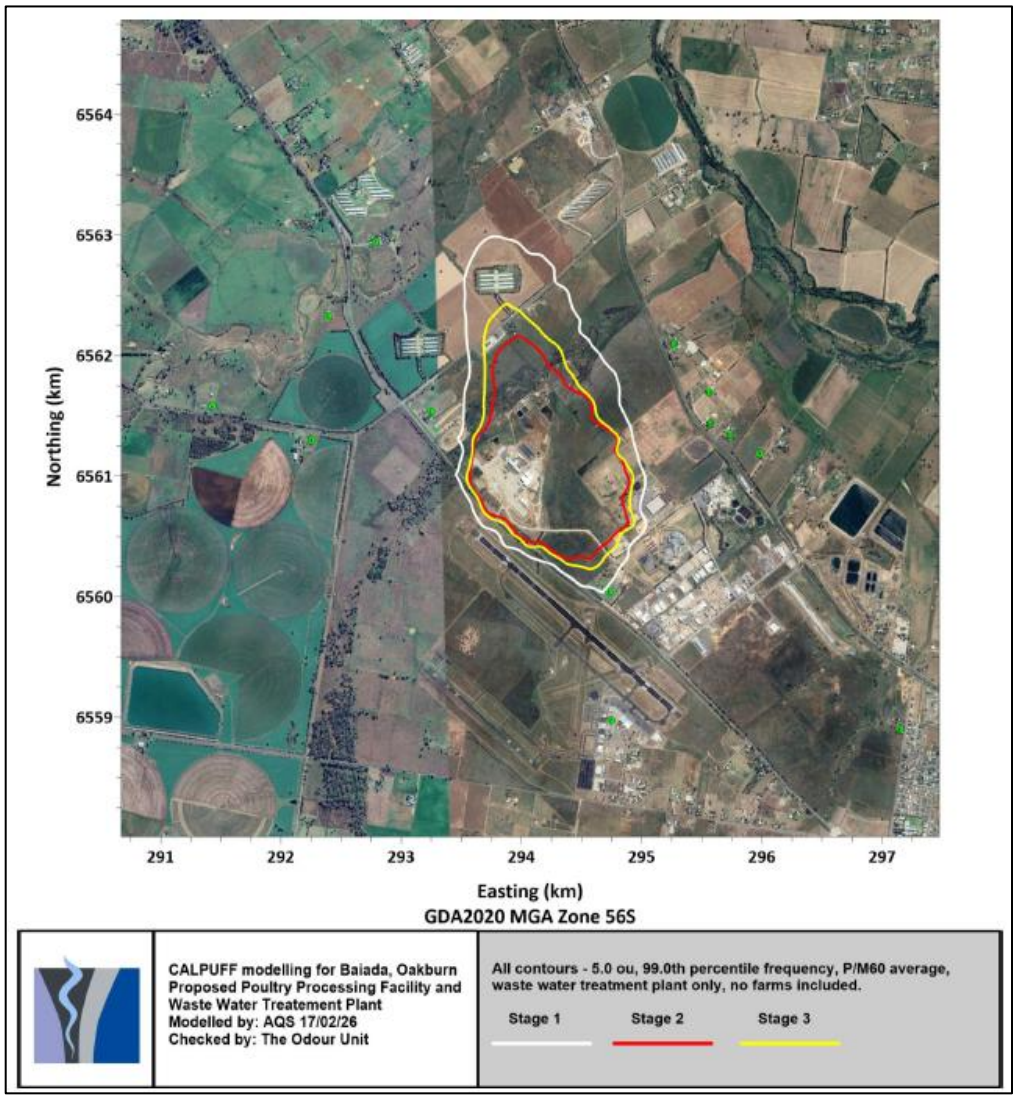


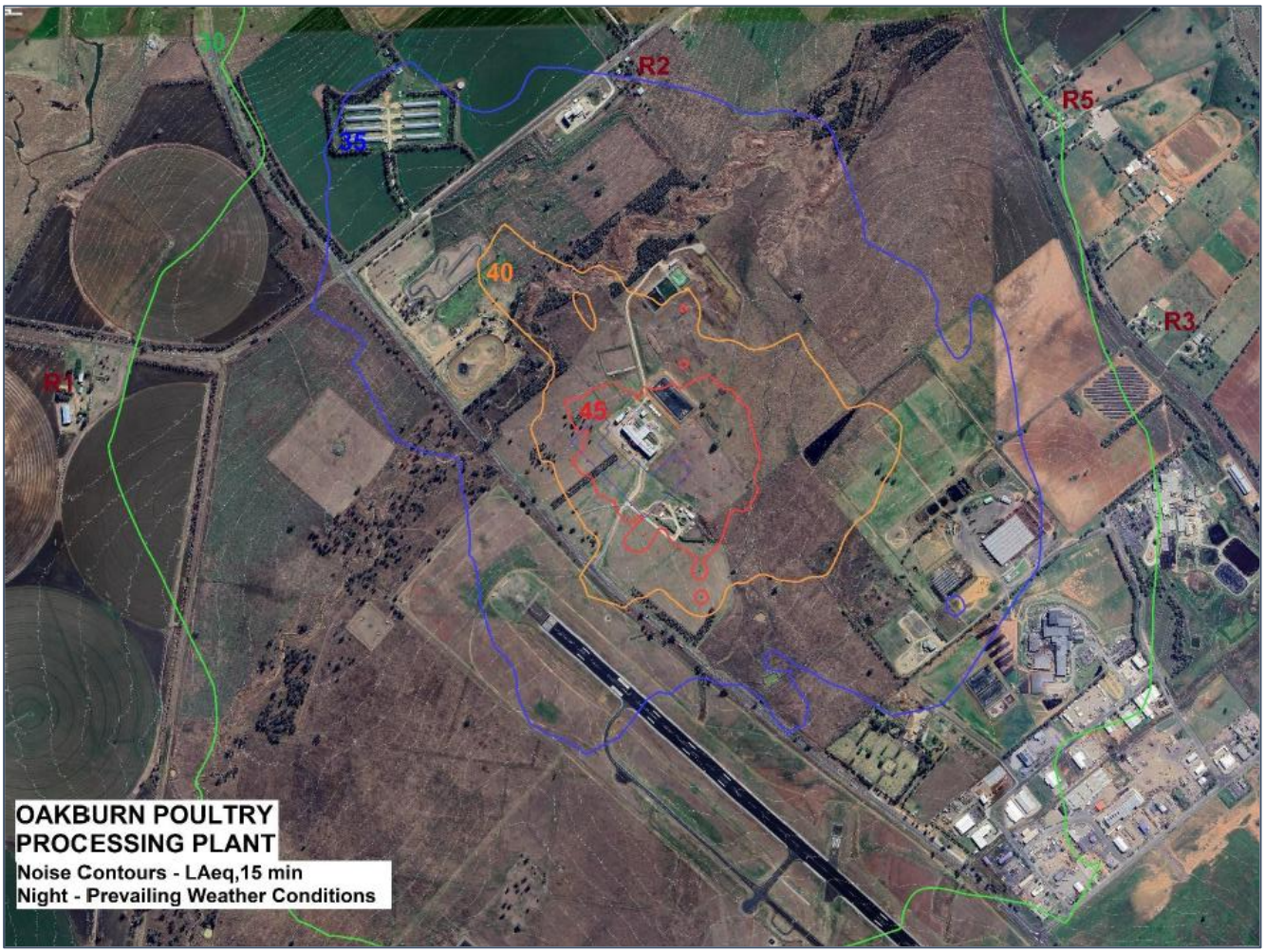
Figure 16: Modified Assessment - Projected ground level odour concentrations - All sources

6.6.3 Management and Mitigation Measures

Due to the removal of the SBR from the wastewater treatment regime, the mitigation measures relating to filling of this outside daylight hours has been removed from the measures presented in Section 7. All other existing conditions, recommendations, management and mitigation measures, associated with the prevention and treatment of odour emissions will continue to be adopted by for the modified project.

6.7 NOISE

As part of the previous Modification (SSD9394-MOD1) an Acoustic Impact Assessment was prepared by Reverb Acoustics which demonstrated that provided the mitigation and management measures were implemented noise levels were predicted to compliant with the EPA's NPfI at all nearby residential receivers during the day, evening and night, for neutral and prevailing atmospheric conditions. The predicted noise levels at the nearest sensitive receptors are shown in ***Figure 17***. It is important to note that the acoustic model assumes that all noise sources were operating simultaneously, which is highly unlikely. As such, the forecast levels were considered a worst-case scenario.



Residential Receiver	Received Noise Levels, dB(A),Leq		
	Neutral Weather Conditions (Day/Evening)	Prevailing Weather Conditions (Day/Evening)	Prevailing Weather Conditions (Night)
Girrawheen R1	18	27	30
Abbeylands R2	27	34	35
The Billabong R3	17	27	28
Airport South R4	12	23	25
Wallamore E R5	18	29	30

Criteria: All Receivers Day=40, Evening=35, Night=35.

Figure 17: Predicted Noise Levels for the Approved Development (Reverb, 2023)

The previous assessment identified potential exceedances during night prevailing weather conditions at Receiver R2 to the north of the site on Bowlers Lane due to operations of the Live Bird area (trucks, forklifts, ventilation fans). In response, the following noise mitigation measures have been conditioned and will be implemented:

- Construction of a noise barrier along the West side Live Bird Area, Hardstand and Access Road with a minimum height of 3000mm.
- Construction of a noise barrier along the north side Processing facility Cooling Towers, equal in height top of towers.

Noise sources associated with the WWTP / AWTP that were included in the previous acoustic impact assessment, included the operation of pumps in four locations marked as s10 and s22 in ***Figure 18***. The noise levels (87db(A) associated with these pumps was sourced from Baiada's Hanwood Processing Facility and associated Wastewater Treatment Plant.

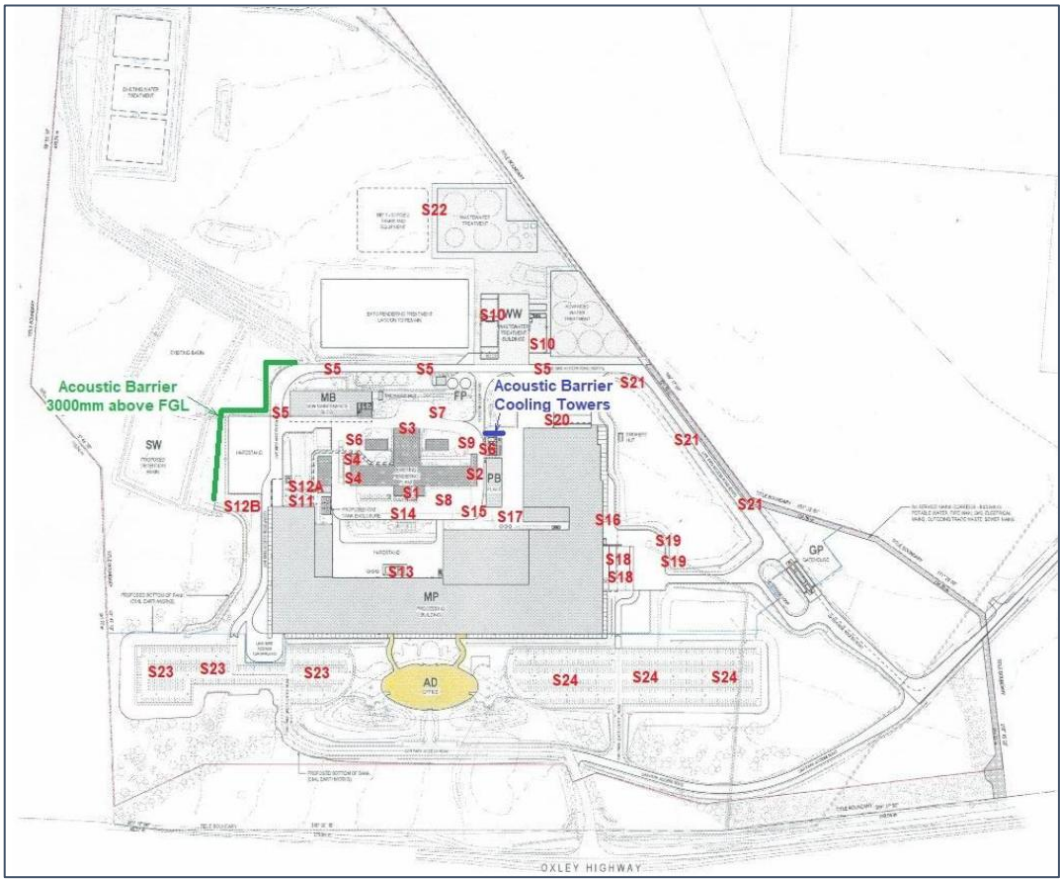


Figure 18: Previously Modelled Noise Sources (Reverb, 2023)

6.7.1 Updated Assessment Results

Pulse White Noise Acoustics has reviewed the proposed modifications with consideration of findings of the previous assessment. The correspondence, included as **Appendix 6** notes that the modifications include the revised, water treatment facility, pumps and associated pipework and infrastructure, operating under ultimate conditions (i.e. Stage 3). The Pulse White Noise Assessment notes that, based on the location of the modified wastewater facility (Stages 1 – 3):

- The location of the proposed processing plant wastewater facility, including all associated plant and equipment, will result in acoustic screening and distance separations to all surrounding receivers such that the resulting noise emissions from the proposed modifications will comply with the requirements of the SSD acoustic requirements as well as the projects acoustic reporting.
- Based on the proposed equipment and activities to be undertake as part of the proposed modification, including the processing plant wastewater facility, compliance with the relevant acoustic requirements including the Project Trigger Noise Levels included in Condition B6 of the current SSD approval will be achieved without additional noise mitigations required.

Based on the details included above the proposed modification to the Baiada Oakburn Poultry Processing Plant including the processing plant wastewater facility (Stages 1 – 3) will be acoustically acceptable and compliance with the noise emission included in the SSD-9394 will be achieved.

6.8 STORMWATER

6.8.1 Previous Assessment

As part of the previous modification (SSD9394-MOD1) a Stormwater Management Plan was developed by MPN Consulting to appropriately manage the potential stormwater quantity and quality impacts of the proposed development.

With respect to stormwater quantity, the site was split into three main sub-catchments – a South West, a North and an East catchment, identified as Catchments A, B and C, respectively. There are also three other sub-catchments including the undeveloped land and access roads in the Eastern half of the site and the undeveloped land on the Southern side of the site, identified as Catchments D and E, respectively.

Stormwater runoff from each of the main sub-catchments will be collected and conveyed in a new internal stormwater pit, pipe and open channel network, prior to discharge to three separate treatment/detention basins. Stormwater will discharge from the basins via overland flow across the site boundaries as per existing condition. Litter baskets will also be fitted to the new field inlet pits to capture gross pollutants.

The existing detention basin constructed as part of the previous approval for the rendering plant has been retained (Existing Basin B) to service Catchment B. New basins have been constructed to the South West (Catchment A) and North East of the site (Basin C) to service Catchments A and C, respectively. Stormwater runoff from each of the other sub-catchments will be collected in grassed swales prior to discharge across the site boundaries via overland flow as per existing condition.

In order to limit the site stormwater discharge, stormwater runoff from Catchments A, B and C will be detained in three separate above ground basins. The basins have been over-sized to cater for the areas which will bypass detention (Catchments D and E). Runoff flows for the Annual Recurrence Intervals from 5 to 100 years and durations of 5 minutes to 2 hours showed that peak runoff flows from the proposed development would not exceed peak runoff flows from the existing site.

Concerning stormwater quality, in order to achieve the pollutant load reduction targets for the development, it was proposed to use natural treatment methods to treat the runoff prior to discharge from the site. Stormwater runoff from Catchments A and B will be treated by gross pollutant traps prior to discharge into the swales and detention basins. Stormwater runoff from the smaller sub-catchments will be treated by swales. The resulting percentage-based load reductions at the site outlets was demonstrated to exceed the target water quality objectives for TSS, TP, TN and Gross Pollutants.

6.8.2 Updated Assessment Results

An updated Stormwater Management Plan has been prepared by SCP and is included as **Appendix 4**. It is important to note that the catchment plan, previously developed by MPN Engineering is relevant as the catchments have not changed due to design changes on site. The modifications to the design have no impact to the original catchments as there has been a concerted effort to maintain the catchments and stormwater flow directions so to not change the existing catchment conditions and as such do not change the approved stormwater drainage concept and basin plans. Accordingly, the previously approved stormwater management plan, catchment plan and associated mitigation and management measures are to remain in place as per the current approval.

6.9 DANGEROUS GOODS

The preceding Modification Application (MOD-5) is currently being assessed by DPHI and seeks to update the approved dangerous goods to be used and stored on site in response to completion of detailed design, finalisation of equipment selections and clarification of operational procedures. As part of MOD-5, an updated SEPP Screening and Preliminary Hazard Assessment, and Dangerous Goods Design Report was prepared by Lote Consulting and submitted in support of the changes.

Based on the analysis conducted, and consistent with the findings of the previously approved PHA it was concluded that the risks at the site boundary are not considered to exceed the acceptable risk criteria. As such, the facility would only be classified as potentially hazardous and would be permitted within the current land zoning for the site. As shown in the updated Preliminary Hazard Assessment, and Dangerous Goods Design Report takes into account the construction of Stage 1 and 2 of the wastewater treatment plan proposed as part of this Modification (MOD-6).

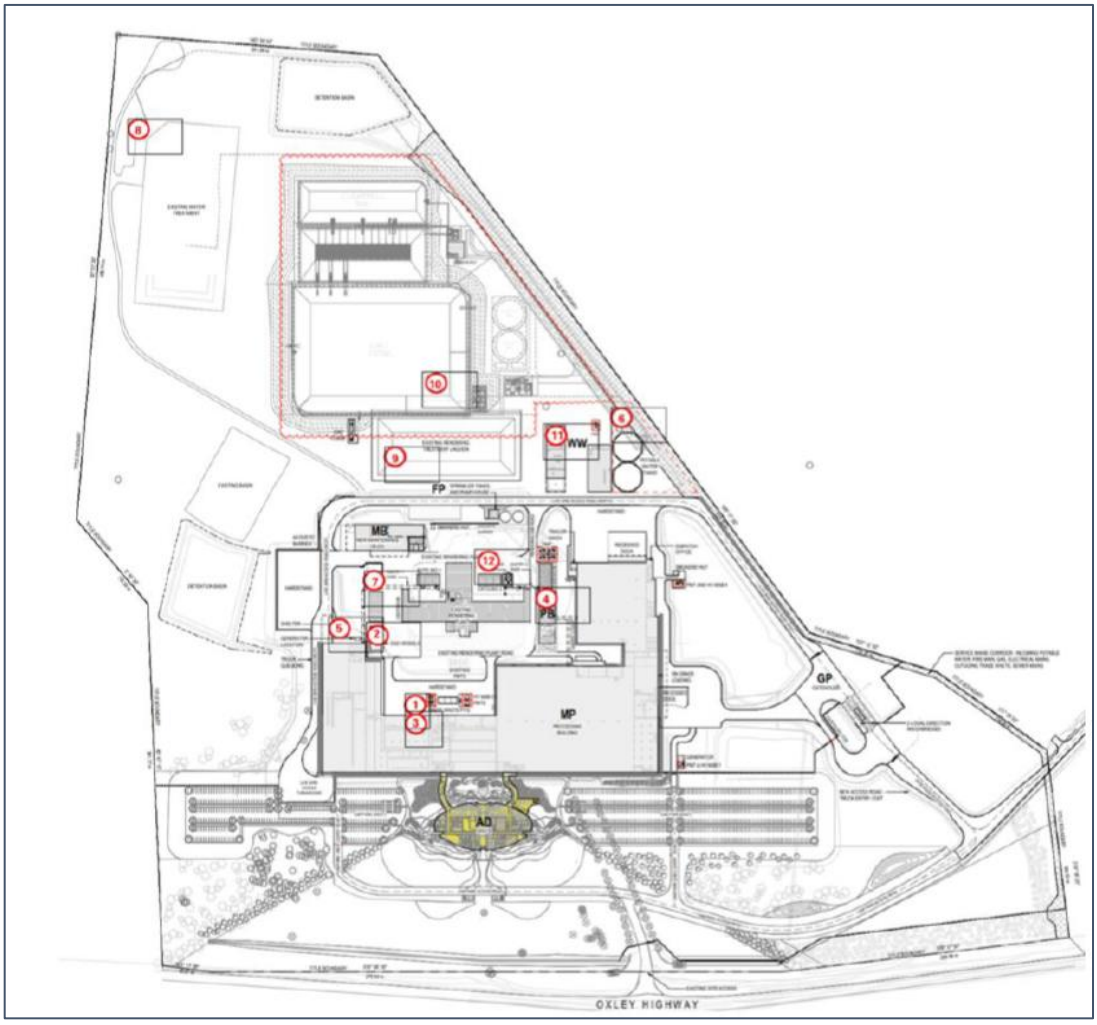


Figure 19: Proposed Dangerous Goods Locations (as per MOD-5)

Based on the analysis conducted, and consistent with the findings of the previously approved PHA the current modification application (MOD-5) concludes that the risks at the site boundary are not considered to exceed the acceptable risk criteria. As such, the facility would only be classified as potentially hazardous and would be permitted within the current land zoning for the site.

As no changes are proposed to dangerous goods volumes, types or storage location proposed as part of this modification application, an updated PHA and Dangerous Goods Design Report is not required in support of this modification.

7 MITIGATION AND MANAGEMENT MEASURES

Updated Mitigation and Management Measures are provided below. Changes to the approved list are identified in blue text.

<table>
<tr><th>IDENTIFIED IMPACT</th><th>MITIGATION MEASURES AND MANAGEMENT MEASURES</th></tr>
<tr><td>TRAFFIC</td><td>

Staff and processing facility traffic are to be directed to use the proposed driveway connecting to Workshop Lane.
Direct access to the Oxley Highway is to be maintained for visitors to the site and emergency access only.
820 car parking spaces are to be provided on site with a minimum of 9 spaces be designated for people with a disability.
Car park design and line-marking is to be undertaken in accordance the Australian Standard 2890.1 (2004).
Due to the length of aisles, speed humps be provided in in accordance with AS2890.1 to provide positive speed control.
Detailed design of the car park to incorporate minor amendments to the kerb line near the northern end of the staff car park to ensure fire truck access is available through the car park if required.
The Internal T-intersection between the staff car park access road and the weighbridge access road be designed as a standard priority T-intersection to reflect the dominant traffic flow.

</td></tr>
<tr><td>AIR QUALITY</td><td>

<s>Filling of the SBR is to be programmed to take place outside of daylight hours where practical.</s>
Implement the Odour Management Plan for the site to prevent or minimise the potential for odour generation through a hierarchy of controls, in the form of, but not limited to, engineered, administration and/or management practices.

</td></tr>
<tr><td>NOISE</td><td>
DURING OPERATIONS
Noise Barrier Area

An acoustic mound or barrier are to be erected at the following locations:
<table>
<tr><th>Location</th><th>Height above FGL (mm)</th></tr>
<tr><td>West side Live Bird Area and Hardstand.</td><td>3000</td></tr>
<tr><td>North side Rendering Building Loop road.</td><td>2100</td></tr>
<tr><td>North side Cooling towers & associated plant</td><td>2100</td></tr>
<tr><td>North side Cooling towers and associated plant.</td><td>2400 (above truck FGL)</td></tr>
</table>

General Noise Control Recommendations

All access roads should be kept in good condition, i.e. no potholes, etc.
Trucks and other machines should not be left idling for extended periods unnecessarily. Machines found to produce excessive noise compared to

</td></tr>
</table>

IDENTIFIED IMPACT	MITIGATION MEASURES AND MANAGEMENT MEASURES
	industry best practice should be removed from the site or stood down until repairs or modifications can be made. • A regular maintenance schedule should be adopted for all mobile and fixed plant items. Items found producing high noise should be stood down until repairs are completed. • A noise monitoring program, during commissioning, or in the early life of the site is recommended. This program will verify our predictions and in the unlikely event that complaints may arise, enable noise control strategies to be implemented, where required. **Noise Monitoring Program** • Noise monitoring should be carried out at the commencement of each process/activity that has the potential to produce excessive noise. **Acoustic Barriers/Screening** • Place acoustic enclosures or screens directly adjacent to stationary noise sources that are likely to result in unacceptable off-site noise impacts (such as compressors, generators, drill rigs, etc). **Consultation/Complaints Handling Procedures** • The construction contractor should analyse proposed noise control strategies in consultation with the Acoustic Consultant as part of project pre-planning. **Equipment Selection** • All combustion engine plant, such as generators, compressors and welders, should be carefully checked to ensure they produce minimal noise, with particular attention to residential grade exhaust silencers and shielding around motors, where necessary. **Risk Assessment** • A risk assessment should be undertaken for all noisy activities and at the change of each process.
ECOLOGICAL	Should any works need to be conducted within the Peel River Tributary, in order to minimise any impact to amphibians, works are to be: • Undertaken during the winter months when movement of amphibian species is not occurring; or • Undertaken during periods of no ephemeral pooling of water in the tributary; or • Undertaken after a pre-clearance inspection by a qualified ecologist determines no amphibian presence at that time. **Preclearance Surveys:** In order to avoid impacts to fauna species during construction, pre-clearance surveys will be conducted in all areas that are required to be cleared. • Pre-clearing surveys will be undertaken ahead of clearing, to limit fauna injury and mortality and to identify habitat features to be relocated. Pre-clearance surveys will be conducted by suitably qualified ecologists and all fauna found during these surveys will be encouraged to move on or relocated by the ecologists in areas of similar habitat nearby that will not be impacted. **Delineation of Clearing Areas:**

IDENTIFIED IMPACT	MITIGATION MEASURES AND MANAGEMENT MEASURES
	• Areas that require clearance will be flagged and clearly delineated by temporary fencing to ensure that no areas intended for conservation will be inadvertently cleared during the construction process. **Weed Management:** • Undertake, appropriate weed control activities in accordance with all state, regional and local weed management plans. **Pre-clearance Surveys (Structures):** • In order to mitigate or avoid impacts to fauna species, (In particular the Eastern Bentwing-bat) during demolition of structures, pre-clearance checks will be conducted of all human made structures proposed to be demolished prior to construction. • Pre-clearance surveys will be conducted by suitably qualified ecologists and all fauna found during these surveys will be encouraged to move on or relocated by the ecologists in areas of similar habitat nearby that will not be impacted.
CULTURAL HERITAGE	**Aboriginal Objects Find Procedure:** If suspected Aboriginal material has been uncovered as a result of development activities within the Project Area: • work in the surrounding area is to stop immediately; • a temporary fence is to be erected around the site, with a buffer zone of at least 10 meters around the known edge of the site; • an appropriately qualified archaeological consultant is to be engaged to identify the material; and • If the material is found to be of Aboriginal origin, the Aboriginal community is to be consulted in a manner as outlined in the OEH guidelines: *Aboriginal Cultural Heritage Consultation Requirements for Proponents (2010)*. **Aboriginal Human Remains:** In the unlikely event that Remains are found, all works should halt. Once the site is cordoned off the nearest police station should be contacted in conjunction with the Tamworth LALC and the Heritage NSW – Aboriginal Cultural Heritage Office. If no investigation is sought and the remains are of Aboriginal origin then the Aboriginal community and Heritage NSW – Aboriginal Cultural Heritage Office should be consulted as to how the remains are to be dealt with. Work may resume once all parties are in agreement. **Notifying the Heritage NSW – Aboriginal Cultural Heritage:** If Aboriginal cultural materials are uncovered as a result of development activities within the Project Area, they are to be registered as Sites on the AHIMS, managed by the Heritage NSW – Aboriginal Cultural Heritage.
STORMWATER	• **Provide all stormwater management treatment actions in accordance with the project Stormwater Management Plan prepared by SCP Engineers (dated 17 June 2025).** • During prior to commencement of constriction, prepare and implement a detailed Erosion and Sediment Control Plan to ensure compliance with the *Protection of the Environment Operations Act 1997*.
WASTE	• Commercial arrangements are to be made with an appropriately licenced facility for the disposal of each of the different types of waste produced at the site prior to the issue of an Occupation Certificate. • Prepare and implement a Site Based Waste Management Plan consistent with Baiada's Australian Packaging Covenant Action Plan.

IDENTIFIED IMPACT	MITIGATION MEASURES AND MANAGEMENT MEASURES
CHEMICAL USE	• Chemical handling and storage procedures will be undertaken in accordance with the Applicable Material Safety Data Sheets (MSDS) and all relevant Australian Standards. **LNG Storage:** • The hoses for the transfer of LNG shall be inspected monthly and pressure tested annually in accordance with the Australian Dangerous Goods Code. • All equipment shall be inspected and tested in accordance with the Australian Dangerous Goods Code. • The over pressurisation shut off for the supply shall be set at not more than 200 kPa.
CONSTRUCTION MANAGEMENT	The Construction Management Plan could address potential social impacts, including reducing stress and inconvenience to neighbouring businesses and residents, by: • Identifying construction vehicle traffic routes that minimise impacts to neighbours, as far as possible; • Providing arrangements for parking of worker and construction vehicles on-site; • Storing all equipment on site; • Identifying management practices to minimise and manage interruptions to traffic flows; • Establishing practices to maintain traffic and pedestrian safety to local residents; • Minimising disruption proposed road closures, temporary traffic routes, loss of pedestrian or cyclist access or reversing manoeuvres; • Providing queueing space onsite for the standing of vehicles; • Providing clear signage to direct construction vehicles; and • Provide signage on site that provides a contact number for residents to direct enquiries and report incidents (e.g. theft or break and enter to the site while unattended), should they occur
ENVIRONMENTAL MANAGEMENT	• Prepare an implemented a detailed Environmental Management System for the Oakburn Processing facility for certification in accordance with the AS/NZS/ISO 14001: 2015 Standard.

8 JUSTIFICATION OF MODIFICATION

Since approval of the modified project in May 2023, Baiada has proceeded with detailed design of the facility, commenced construction and is aiming to commence operations in mid-2026. The critical change with respect to this modification is a refined staging approach to delivery of wastewater treatment for the site, which will enable commencement of operations in the short term, expand the treatment process concurrently with production, and ultimately allow for advanced water treatment to occur on site. The staging also reflects agreements reached with Council regarding the provision of potable water supply to the site, and trade waste discharge for Stage 1.

Specifically the modification will enable the delivery of the wastewater treatment plant in the following stages:

- Stage 1 represents a transfer of the current trade waste allowances from the existing Out Street Poultry Processing Plant to Oakburn, which will not result in change to the current quantity of wastewater (12.8ML / WK) discharged to Council's Westdale Wastewater Treatment Plant.
- Stage 2 will involve demolition of the existing rendering plant treatment lagoon (the existing CAL) and integration of the Rendering WWTP with the new on-site WWTP. Following treatment on site, treated waste water (25.6ML / WK) will be discharged as trade waste for further treatment at the Westdale WWTP. Commencement of Stage 2 will be subject to entry into a temporary Trade Waste Agreement with Council for the increased discharge volume.
- Stage 3 involves expansion of Stage 2 infrastructure and construction of the Advanced Water Treatment Plant (including brine management solutions), which will have the capacity to return up to 30ML of advanced treated water for re-use on the site. Once Stage 3 is implemented, the wastewater discharged to the Westdale WWTP will be reduced to Stage 1 levels (12.8ML / WK).

Pursuant to commercially confidential agreements (provided separately to DPHI), town water in the amount disclosed to DPHI is available to the facility In Stage 3 this supply will be supplemented by up to 30 M (up to 59%) recycled water provided by the Advanced Water Treatment Plant to be constructed in Stage 3.

The following sections provide a justification of the proposed modification with consideration of the proposed Biophysical, Economic and Social factors as well as the principles of Ecologically Sustainable Development.

8.1 BIOPHYSICAL CONSIDERATIONS

Based on the assessments undertaken by the relevant technical specialists, it has been demonstrated that the proposed development can be undertaken in a manner consistent with the statutory obligations in relation to potential:

- Ecological Impacts;
- Acoustic Emissions;
- Odour and Dust Emissions;
- Stormwater Quality and Quantity Impacts;
- Cultural Heritage Impacts;
- Waste Management; and
- Biosecurity Risks.

As such, it is considered that there are no bio-physical considerations which would preclude approval of the modified development.

8.2 ECONOMIC CONSIDERATIONS

As demonstrated in the previous submissions, the project will have a positive economic impact in terms of significant construction works and ongoing employment opportunities for local residents. The economic impacts forecast in the original EIS included:

- Direct employment for around 1,176 workers which represents a net increase of 682 jobs over the base case.

- Indirect employment including the creation of an additional 2,039 jobs (1,323 jobs associated with the inputs to production and a further 716 jobs providing the goods and services to the additional workers).
- HillPDA previously calculates that every one million dollars of construction generates 2.15 full time positions over 12 months directly in construction on site. Based on the revised cost of $285m, approximately 585 job years would be directly generated.
- As outlined above, a key component in the development of the Tamworth region as a poultry cluster is the availability of local grain from farms in the region to produce poultry feed blends while minimising transport costs. As per current operations, grain for the expanded operation will be primarily sourced from the surrounding areas including Tamworth, Moree, Narrabri, Walgett and Gunnedah. The economic benefits from the increase in regional grain supply estimated to be 546,000 tonnes per year (~$136.5m), are factored into the multipliers described above.
- To support the increase in processing of poultry within the region, significant increases in the supply of birds will be required. It is expected that around 350 additional poultry sheds will be required to service the ultimate capacity of the Oakburn processing facility. This growth is expected to occur via expansion of existing farms, as well as new farms located on suitable sites, located within a 2-hour drive of the Oakburn processing facility in accordance with animal welfare considerations. Expansion of broiler farms will be subject to identification and acquisition of suitable sites and the relevant statutory approvals being obtained by Applicants.

Specifically, the modification allows for a refined staging approach to delivery of the wastewater treatment plant on the site, which will enable commencement of operations in the short term, expand the treatment process concurrently with production, and ultimately allow for advanced water treatment to occur either on or off site. The staging also reflects agreements reached with Council regarding the provision of potable water supply to the site, and trade waste discharge for Stage 1.

The AWTP planned for an onsite solution in Stage 3, will return up to 30 ML of potable water for re-use within the processing plant which equates to 71.4% of the 42 ML per week originally proposed. This change has been made in response to Tamworth Regional Council confirming that additional, sustainable, potable supply can be provided to the Oakburn Processing Plant, which can be produced at significant reduction in energy used (and cost) per litre compared to the AWTP.

Additionally, the revised wastewater treatment process will provide a renewable source of biogas via the Covered Anerobic Lagoon, which can offset approximately 33% of natural gas used in processing operations.

With consideration of the direct and indirect economic benefits the modified project continues to display a positive economic impact for the region.

8.3 SOCIAL CONSIDERATIONS

With respect to social impacts, the findings of the detailed technical assessments undertaken in relation with the previous modification demonstrate that the project is unlikely to have significant, negative social impacts provided the approved mitigation and management measures documented in this Modification Report are implemented. The modifications proposed as part of this application are not expected to result in any additional social impacts.

More broadly, chicken meat is Australia's most consumed meat protein and is an affordable dietary staple for many people. According to a 2021 AgriFutures report, 68% of Australians eat chicken at least twice a week. This demand is growing as chicken's price remains stable and affordable compared to other protein sources. Baiada is Australia's largest integrated poultry producer, supplying 40% of the nation's chicken requirements. Baiada and its operations are essential to Australian food security, making expansion of Baiada's operations via the Oakburn Integrated Poultry Processing Facility critical to avoid supply shortages of this essential food.

With consideration of the positive impacts, particular in relation to economic investment, local employment opportunities, and the processing plant's contribution to Australian food security, it is considered that the integrated poultry processing plant will have a positive social outcome.

8.4 PRINCIPLES OF ECOLOGICALLY SUSTAINABLE DEVELOPMENT

A discussion of the proposal's compliance with the principles of Ecologically Sustainable Development is also provided in Table 8.

Table 8: Principles of Ecological Sustainability

PRINCIPLE	DISCUSSION
(a) the precautionary principle, namely, that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. In the application of the precautionary principle, public and private decisions should be guided by: *(i) careful evaluation to avoid, wherever practicable, serious or irreversible damage to the environment, and* *(ii) an assessment of the risk-weighted consequences of various options,*	**Complies.** There are no threats of serious or irreversible environmental damage that have been identified as part of the detailed assessments undertaken with respect to the modified project. A number of mitigation, management and monitoring measures that were approved under the previous applications are also applied to proposed operation to ensure that it will perform in accordance with all relevant environmental standards.
(b) inter-generational equity, namely, that the present generation should ensure that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations,	**Complies.** The proposed development will not result in the impacts that will reduce the health, diversity and productivity of the environment or reduce the potential benefits of future generations. Conversely, the proposed development will continue to support the operations the approved development site and support the broader growth and economic development associated with poultry production in the New England Region.
(c) conservation of biological diversity and ecological integrity, namely, that conservation of biological diversity and ecological integrity should be a fundamental consideration,	**Complies.** The amended WWTP design is located within the impact footprint as proposed in the Updated BDAR (MOD-4) and as such, no additional impacts beyond what are currently being considered in the preceding Modification are forecast. The impact for Stage 3 will be determined once that design is developed and appropriate approvals sought if there is any impact.
(d) improved valuation, pricing and incentive mechanisms, namely, that environmental factors should be included in the valuation of assets and services, such as: *(i) polluter pays, that is, those who generate pollution and waste should bear the cost of containment, avoidance or abatement,* *(ii) the users of goods and services should pay prices based on the full life cycle of costs of providing goods and services, including the use of natural resources and assets and the ultimate disposal of any waste,* *(iii) environmental goals, having been established, should be pursued in the most cost effective way, by*	**Complies.** Beyond the alteration to the wastewater treatment plant included as part of this modified development, there is not change to the approved approached to waste management and handling associated with solid waste, packaging waste, processing wastes and recycling.

PRINCIPLE	DISCUSSION
establishing incentive structures, including market mechanisms, that enable those best placed to maximise benefits or minimise costs to develop their own solutions and responses to environmental problems.	

As demonstrated in this Modification report, the proposed development complies with the relevant statutory planning instruments and will not result in any additional or unacceptable adverse environmental impacts on the receiving environment.

The proposal capitalises on and improves the existing approvals on the site and supports the ongoing expansion of the broader poultry industry and economic development in the New England Region. Where potential impacts have been identified, suitable mitigation and management measures have been implemented. Accordingly, approval of the proposed modification is justified.

PSA CONSULTING

psaconsult.com.au

PSA Consulting Pty Ltd ABN 83 109 836 197
T + 61 7 3220 0288 F +61 7 3220 0388
Brisbane (Head Office) L11 / 270 Adelaide Street, Brisbane / Meeanjin Qld 4000
PO Box 10824 Adelaide Street Brisbane Qld 4000