

Response to Submissions Crossman Natural Fertiliser Project Shire of Boddington



Prepared For: Beacons Consulting
International
16 Sherriff Circuit
WATTLE GROVE WA
6107

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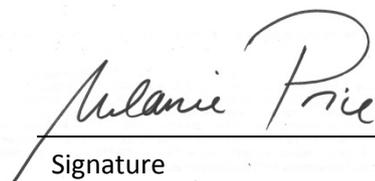
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Author: Melanie Price
*Associate Environmental
Scientist*



Signature

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Date

Reviewed by: Noel Davies
*Manager – Waste and
Special Projects*



Signature

11 May 2016

Date

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LIST OF ABBREVIATIONS

BBPL	Boutique Biofertilisers Pty Ltd
BCI	Beacons Consulting International
DER	Department Environment Regulation
DoW	Department of Water
EMRC	Eastern Metropolitan Regional Council
m	metre
mm	millimetre
WA	Western Australia

1 INTRODUCTION

Aurora Environmental has been commissioned by Beacons Consulting International (BCI) and Boutique Fertilisers Pty Ltd (BBPL) to provide environmental planning advice in relation to the establishment of a natural fertiliser plant which will process selected residues and manures to create high performance fertiliser.

This report provides an analysis of submissions received during the advertising period inviting public comment on the Crossman Natural Fertiliser Project proposed to be established at No 9902 Albany Highway at Crossman in the Shire of Boddington. The advertising period, coordinated by the Shire of Boddington was for six weeks, ending on 2 May 2016.

Comments from government agencies, organisations and from the public have been summarised into the relevant issue categories with responses provided in order to address questions and concerns prior to the consideration of the project for planning approval by the Shire of Boddington.

The proposal has been referred to the WA Department of Environment Regulation (DER) and has been assessed as under Part V of the *Environmental Protection Act 1986* as a Works Approval application. The DER has finalised its assessment and issued draft approval which will be issued as final approval on completion of the planning approval process with the Shire of Boddington.

1.1 BACKGROUND & DESCRIPTION

BBPL proposes to establish a small scale solid waste processing facility to be known as the Crossman Natural Fertiliser Project (CNFP) located on No 9902, Albany Highway, Crossman, Western Australia. The proposed facility will be located in 40 hectares of rural zoned land as defined within the Shire of Boddington Local Planning Scheme No. 2, approximately 15 km east south east of Boddington, and 130 km south east of Perth.

The facility will be accessed from South Crossman Road, surrounded by a stock fence with lockable boom gates. The facility will be manned between the hours of 7am to 5pm, 5 days per week with an alarm system activated when not manned.

BBPL propose to produce (solid) pelletised fertiliser for retail and wholesale markets in bags, tubs and in bulk following the construction of a completely enclosed and contained processing facility. The construction phase will include the development of:

- Feedstock receipt and storage facilities constructed on a bunded concrete pad, covered with an elevated roof;
- Grinding and screening plant;
- Mixing plant;
- Pelletising plant;
- Bagging plant;
- Odour control system (extracts air from the storage and process areas to an odour absorption 'biofilter' unit);

- Storage facilities (enclosed);
- Two 250 kW packaged diesel alternator sets and self-bunded diesel fuel tank (10,000 L) are to be placed on a sealed concrete bunded area with drive over bunds. The diesel storage fuel tank access point will be placed under an elevated covered area;
- Storage tanks for water supply sourced from rainwater (25 kL), tanker delivered water and dam water or groundwater depending on availability from the owner of the leased premises;
- One stormwater drainage pond (HDPE lined) for stormwater potentially considered contaminated;
- Drainage ponds (in-situ soils) for general stormwater drainage control at the premises; and
- Internal access roads and parking areas (compacted aggregate covered and compacted pebble gravel, with final 20 m bituminised and drainage culvert in place.
- Enclosed within an insulated, colour-bond building to house all production equipment, and on a graded concrete hardstand with three sumps.

The fertiliser pellets will be manufactured from a variety of natural feedstocks (consisting of animal manures, mineral binders and small quantities of trace elements). The dry nature of the manures and relatively small quantities handled at any one time, mean that the facility has a relatively low potential for odour generation. Feedstocks will be received and temporarily stored in bays and/or a silo (for less than a day) prior to being taken within the fully enclosed facility.

Animal manures in bulk form will be received via trailer or tipping trucks with “wind-on tarps” and will be delivered in spadeable (less than 40% moisture w/w) form to a maximum single delivery of 38 tonnes, with a maximum of 4-6 tonnes being processed at any time. Manures are then transferred to storage bays as soon as the delivery is completed, using front end loaders, from which it is then loaded into hoppers for transfer to a conveyor belt system all within the enclosed facility.

From the conveyor belt, the manures will be transferred to the main hopper for the hammer mill, which will be covered (with a closed lid) when not being loaded. The hammer mill will be electric powered and fully enclosed with a screen to remove oversized material which will then be recirculated for further milling.

The milled product is brought by enclosed conveyor to an enclosed storage bin which has a 20 tonne capacity. Feedstock is then transferred for mixing with additional small amounts of trace elements, chemical reagents and mineral binders within an enclosed electric mixer through a gentle/ slow rotation process, which assists in reducing dust emissions. The combination of all the feedstock’s has been identified by the proponent as assisting in the reduction of odour emissions by reducing moisture content further due to the nature of the feedstocks that are mixed.

The mixed product is then considered dry, stable and non-odourous and will be pelletised for bagging and packaging. The product undergoes a heating (90 degrees Celsius) and cooling (70 degrees Celsius) phase prior to packaging within either sealed bags or tubs. All fumes/ gases are directed through to the (biofilter) odour control system. The proponent has developed an odour management plan and will develop an environmental management plan prior to operations commencing.

Distance to the nearest sensitive human receptors are approximately 1.2km south west (farm residence), 1.0km south east (owner's residence) and 820m north east (Caravan Park). Consultation by the proponent with the Caravan Park identified concerns regarding odour from the facility (BCI, 25 January 2015).

A desktop assessment based on WIN groundwater bore (Site Id 20047368), located approximately 2.3 km south west of the premises, identified depth to groundwater as approximately 42.7 mBGL with a TDS of 357 mg/L (fresh). The Crossman River is located approximately 250 m north east of the premises boundary.

DER *Draft Guidance Statement for Separation Distances to Sensitive Receptors* (DER, 2015) recommends a distance of 500 m for noise, odour and dust. While the draft document has not yet been adopted, the DER has applied it to the proposal. The current guidance (EPA, 2005), states that a separation distance of 200m is considered acceptable for a waste depot (premises on which waste is stored or sorted, pending final disposal or reuse).

The site has already been cleared and no native vegetation clearing permits are required.

The primary emissions expected from the construction phase include fugitive emissions (dust) and noise which will be intermittent and short term. The primary emissions expected during operation include fugitive emissions (dust), noise, odour and emissions to land from the discharge of potentially contaminated stormwater used for dust suppression or irrigation to pasture land.

The DER has undertaken an in depth assessment as part of the Works Approval process and considered the transport, process and possible emissions from the proposed operation. DER has concluded that the potential impacts can be managed, with no impacts likely on the surrounding environment or residents.

It should be noted that the proposed process is very different from the production of chemical fertilisers (e.g. superphosphate). The proposed process is physical and involved blending, drying and pelletising. Chemical fertiliser production involves use of concentrated and hazardous feedstocks and reactive chemicals such as acids and ammonia with the need to control emissions (such as sulfur dioxide). The chemical fertiliser products are also generally more soluble and bioavailable, so if spillages occur they can move rapidly in the environment and cause acute effects if not adequately managed. Such works are licensed as chemical works and the recommended buffer distances are larger - 1,000 - 2,000 m in the EPA (2005) guidance document and 1,000 m in the Draft DER Guidance (2015). In addition, the scale of the proposed plant is much smaller than a chemical fertiliser plant.

The cost stated in the development application was for \$717,000 which covers the land and building component of the project. The entire value of the project is estimated to be \$5.5 million. This is below the threshold for mandatory consideration by the Development Assessment Panel (DAP).

1.2 CONSULTATION PROCESS

The proposal was released for public comment for a period of six weeks with submissions accepted up until 2 May 2016. The Shire of Boddington provided documentation regarding the project on its webpage, with copies of the proposal held at its administration office.

The Shire sought input from the following stakeholders via:

- Writing to landowners located within approximately 5 kilometre radius of the application site within the Shire of Boddington;
- Writing to State Government agencies, adjoining local government authorities, politicians and other stakeholders;
- Writing to Councillors;
- Placing a public notice twice in the Bodd News;
- Placing a public notice in the Narrogin Observer
- Placing a public notice on the Shire notice board;
- Having information available at the Shire office;
- Including details on the Shire website; and
- Placing signs on the Albany Highway and South Crossman Road frontages of the site.

In particular, the Shire invited comments from the following:

- Department of Environment Regulation;
- Department of Parks and Wildlife;
- Department of Water;
- Department of Health;
- Department of Fire and Emergency Services (Narrogin);
- Department of Agriculture and Food;
- Department of Mines and Petroleum;
- Western Power;
- Main Roads WA (Narrogin);
- Peel Development Commission;
- Department of Aboriginal Affairs;
- Shire of Williams;
- Shire of Wandering;
- Bush Fire Chief and local captain;
- Peel-Harvey Catchment Council;
- Hotham Williams Economic Development Alliance;
- Boddington River Action Group;
- Councillors;
- Local politicians – upper & lower house; and

- The applicant.

Written submissions in hard copy and/or electronic format were received by the Shire of Boddington, which provided an acknowledgement, collated submissions and forwarded them to the proponent and consultant team for initial assessment and compilation of responses. The following were received:

- Twenty six (26) written submissions (Appendix 1);
- Eighty two (82) proforma submissions (Appendix 2); and
- An online petition via iPetitions.com with 206 signatures (plus 23 signatures of people who had also provided written or proforma submissions (Appendix 3).

A list of submitters who provided written submissions is included in Appendix 1. Submissions are also provided.

A summary of proforma submitters and the submissions are included in Appendix 2.

Submissions have been summarised by issues raised and are addressed with responses from the proponent in Appendix 4.

1.3 CRITERIA FOR ANALYSIS OF SUBMISSIONS

The submissions were assessed using the following criteria:

1. The proposal *should* be amended where the submission raises an issue:
 - (a) results in substantive change that the proponent agrees would achieve a better outcome; or
 - (b) results in specific change that the proponent agrees would achieve a better outcome; or
 - (c) indicates the need for modification (or clarification) due to the proposal conflicting with legislation, regulation, adopted standard local government or State government policy; or
 - (d) provides additional relevant information related to omissions, inaccuracies or a lack of clarity.

or

2. The proposal *should not* be amended where the submission:
 - (a) clearly supports the proposal; or
 - (b) offers an unclear or a neutral statement or opinion; or
 - (c) addresses issues beyond the scope of the proposal or conflicting with legislation, regulation, adopted standard, local government or State government policy; or
 - (d) makes points already addressed in the proposal; or
 - (e) provides an alternative or suggested approach that the Proponent considers would not achieve a better outcome; or

(f) is amongst widely divergent viewpoints received on the issue and the Proponent considers the proposal is the best option; or

(g) offers comment or critique which is noted by the Proponent.

1.4 ANALYSIS OF SUBMISSIONS

A total of 26 written submissions were received, including from private individuals and organisations which wrote or emailed submissions. Two submissions were in favour of the proposal, nine provided advice and 15 opposed the proposed development. An additional 82 submissions were in the format of a pro-forma which had been personalised by individuals. An online petition was also submitted with 206 signatures against the proposal (23 additional signatures were from people who had either submitted a written or proforma submission). There were several people who provided written, proforma and petition submissions. All submissions were carefully reviewed to ensure that individual issues were summarised and considered.

It is the view of BBPL that the proforma submissions and the online petitions are not based on consideration of the proposal documentation. It is extremely doubtful that any of the people who signed these documents were fully appraised of the details of the proposal, in particular:

- The limited scale of the operation;
- The fully enclosed nature of the facility;
- The level of environmental controls ;
- The level of environmental management;
- The low overall impact on the environment and amenity; and
- The economic benefits to the region.

The text provided with the online petition provides almost no information on the proposal other than statements which are designed to raise fears and concerns regarding the scale of the operation and its environmental impacts. Therefore, it is considered that the proforma submissions and online petition provide little useful input to the submission process.

TABLE A
ANALYSIS OF SUBMISSIONS

Submitter Category	Number of Submissions
Written Submissions	
Private Individuals	13
Community Group or Not for Profit Organisation	2
Business	3
Government Agency (including local government)	7
Proforma Submissions	

Proforma	82 (some people also submitted written submissions or signed a petition)
Petition	229 signatures, 23 from people who also submitted written or proforma submissions

2 RESPONSES TO SUBMISSIONS

The responses by the proponent to issues and points raised in submissions are reflected in Appendix

4. The issues raised in the submissions are grouped by factors under the following headings:

- Buffer requirements;
- Odour;
- Dust;
- Noise;
- Light;
- Environmental damage through emissions;
- No stated exclusions on materials that can be used in the process (such as contaminants);
- Proximity to caravan park;
- Failure of drainage system and possible discharge of nutrients to Crossman River;
- Leaching from containment ponds;
- Traffic (volume and vehicle movements);
- Establishment of view corridors needed;
- Community consultation;
- Insufficient information provided;
- Presence in a rural area/ Appropriateness of zoning and designation of 'Industry - Rural' vs 'Industry Noxious';
- Need for environmental impact assessment;
- General aesthetics (visual);
- Tourism and local economy;
- Property values;
- Development Assessment Panel;
- Setting of conditions for monitoring operation;
- Risk of explosion or industrial accident;
- Impacts on local business;
- Health concerns;
- Setting a precedent for other Rural - Industry activities;
- Lack of power and water on proposed property;
- Drainage Management; and

- Bush fire regulations.

3 MODIFICATIONS TO PROPOSAL

Based on input from the submissions and additional planning that has been undertaken, and where deemed appropriate, the proposal has been modified. These modifications are listed in Table B.

**TABLE B
 MODIFICATIONS TO PROPOSAL**

ISSUE	PROPOSED MODIFICATION
Dust	The large doors on the materials receival bay will be fitted with curtains to prevent dust release from the shed and BBPL is examining the possibility of fitting quick closing doors on these openings.
Drainage Management	Stormwater infrastructure for runoff from hard stands and roads will be designed and constructed in order to be consistent with the <i>Stormwater Management Manual for Western Australia</i> (DoW, 2004 - 2007) and the <i>DoW Water Quality Protection Note 52: Stormwater Management at Industrial Sites</i> .
Light	The project will ensure consistency with AS 4282-1997 - Control of the Obtrusive Effects of Outdoor Lighting
Bush Fire Risk	The facility will comply with requirements in relation to construction in a Bush Fire prone area.

4 REFERENCES

Aurora Environmental (2016) Planning Consent Application – Shire of Boddington. 21 March 2016.

Australian Standards (1997) AS 4282-1997 - Control of the Obtrusive Effects of Outdoor Lighting.

Beacons Consulting (2015) Works Approval Application – Natural Fertiliser Project Pty Ltd – Crossman Natural Fertiliser Project. No 9902 Albany Highway Crossman, 6390. Shire of Boddington. Prepared for consideration by Department of Environment Protection. 20 November 2015.

Beacons Consulting (25 January 2015) Email from Clifford Jones to Paul Easton.

DER, Department of Environment Regulation (2015) Draft Guidance Statement for Separation Distances to Sensitive Receptors.

DER, Department of Environment Regulation (2016b) Draft Decision Document Environmental Protection Act 1986, Part V – for Crossman Natural Fertiliser Project at No 9902 Albany Highway, Crossman WA. W5945.

DER, Department of Environment Regulation (2016a) Works Approval – Environmental Protection Act 1986, Part V – Boutique Biofertilisers Pty Ltd – W5945/2016/1.

DoW, Department of Water (2004 – 2007) Stormwater Management Manual for Western Australia (DoW, 2004 - 2007) and the

DoW , Department of Water (2010) Water Quality Protection Note 52: Stormwater Management at Industrial Sites.

Environmental Protection Authority (2005) Separation Distances between Industrial and Sensitive Land Uses. Guidance for the Assessment of Environmental Factors in Accordance with the Environmental Protection Act 1986. Guidance No. 3.

Submission No.	Issue	Response
1	Buffer requirements	Buffers for operations related to industrial processes are guided by the Environmental Protection Authority 'Guidance for the Assessment of Environmental Factors - Separation Distances between Industrial and Sensitive Land Uses' (EPA, 2005) and Department of Environment Regulation 'Draft Guidance Statement for Separation Distances to Sensitive Receptors' (DER, 2015; yet to be finalised) which states that a 500m separation is recommended to reduce the risk of odour, dust and noise on sensitive receptors. The closest sensitive receptor is the proposed Caravan Park which is 820m to the north of the proposed facility. The DER has considered the proximity of sensitive receptors in the interim Works Approval issued on (DER2015/001770) and considers that the facility is compliant and does not present an undue risk. The DER works approval contains conditions relating to possible emission and requires controls and monitoring which will form part of annual reporting requirements by the plant operators.
2	Odour	The facility will be enclosed, with an odour control system to ensure that there will be no detectable odour off-site. Pilot trials indicate that the risk of odour emissions are low due to the nature of the feedstocks and the relatively small quantities that are handled at any one time. In addition, the plant will have an odour management system to extract air from the storage and process areas which then treats the air via an odour absorption unit. Material transported to the facility for processing will be in covered trucks, with trucks emptied inside a shed and immediately transferred into covered bins. Feedstocks are removed in small quantities from the storage bins and placed feed hoppers fitted with odour extraction ducting. From this point the process occurs in enclosed machinery fitted with odour extraction systems. The sheds will be equipped with odour extraction systems in key locations with potentially odorous air being directed to a biofilter before being discharged to atmosphere. This means that no odour will leave the property boundary. The DER has considered the risk of odour emissions in the interim Works Approval issued on (DER2015/001770) and considers that the facility will not emit an unacceptable level of emissions, given the proposed process, and therefore does not present an undue risk. The DER works approval contains conditions relating to odour control and monitoring which will form part of annual reporting requirements by the plant operators. A key safe guard is the fact that the plant will start at low production levels and will only ramp up production if all environmental controls are demonstrated to be working correctly.
3	Dust	All incoming materials will be handled inside the shed system using enclosed equipment, with minimal opportunity for dust generation. A dust suppression misting spray will be used inside the sheds, with regular sweeping of floors in the materials delivery and storage area. The large doors on the materials receival bay will be fitted with curtains to prevent dust release from the shed and BBPL is examining the possibility of fitting quick closing doors on these openings. There is virtually no risk of dust leaving the property from the facility. Dust from truck movements will be suppressed by bituminising the 20m of road surface closest to Crossman Road, application of magnesium oxide (DustMag), use of 'wind on traps' on trucks, enforcing a 10 km/hr speed limit within the property and ensuring that the internal road surface is maintained in good condition. The DER has considered the risk of dust emissions in the interim Works Approval issued on (DER2015/001770) and considers that the facility will not emit an unacceptable level of dust given the proposed process, and therefore the facility is not considered to represent an undue risk. The DER interim Works Approval contains conditions relating to emission controls and monitoring which will form part of annual reporting requirements by the plant operators.
4	Noise	The processing will take place in an enclosed, insulated shed to suppress noise. Noise modelling indicates that noise will be generated at an acceptable level, consistent with the <i>Environmental Protection (Noise) Regulations 1997</i> . All equipment used will be based on their specifications as low noise emission devices. Within six months of operation, a noise verification study will be undertaken and reviewed by DER. The plant operation will be restricted to daylight hours until this noise verification study has been completed and approved. These actions form conditions set in the DER interim Works Approval. The building structure will be formed from fully insulated double skinned steel panels to attenuate noise emissions.
5	Light	The facility will not be highly lit outside the process sheds, as operations will be carried out inside the shed complex. Outside lighting will be only be provided for safety and security. Installation of lights will meet the requirements of <i>Australian Standards AS 4282-1997 - Control of the Obtrusive Effects of Outdoor Lighting</i> .
6	Environmental damage through emissions	The treatment process will be undertaken within an enclosed building. The operation is based on a simple physical process and does not involve any harsh chemicals or biological treatments such as composting. The process involves grinding and milling, mixing, drying, pelletising and packaging. No liquids or water will be added, nor is any liquid waste added to the process. This means that there is no liquid effluent generated by the process. Hardstands that are not under cover will be swept to ensure that no materials are discharged. There is minimal potential for stormwater generated on the hardstands and roads surrounding the building to be contaminated but even so, stormwater will be directed to a lined basin to ensure that there is no risk of leaching to the environment. The lined basin will have a freeboard of 500mm and contain a 1 in 10 year or 72 hour extreme rainfall event as recommended by the Department of Water. Stormwater from the roofs of the facility will be clean and directed to clay based dams for use on the property. Fuel stored on site will be kept in a self bunded tank on a concrete hardstand. These actions form conditions set in the DER interim Works Approval.
7	No stated exclusions on materials that can be used in the process (such as contaminants)	The feedstock for the process will comprise low moisture animal manures, trace elements, nutrients, mineral binders and biomass products. No toxic or prohibited substances will be used in the process. The feedstocks are generally natural materials and organic classification/certification being sought for the products produced by the facility.
8	Proximity to caravan park	As discussed in Item 1, the proposed facility is enclosed and meets the separation requirements set by the DER. In issuing the interim Works Approval under the <i>Environmental Protection Act 1986</i> (EP Act), the DER has fully assessed the potential risks and proposed methodology. The DER has issued the interim Works Approval with conditions to ensure that there will be no off-site impacts on neighbours and the environment.

Submission No.	Issue	Response
9	Failure of drainage system and possible discharge of nutrients to Crossman River	As a totally enclosed facility handling low risk natural products, there is minimal risk of any materials being released or discharged to the environment. Notwithstanding, the stormwater drainage system has been designed to Department of Water standards with a lined containment dam to capture run-off and secondary dam to provide further protection.
10	Leaching from containment ponds	As described previously, the feedstocks are natural materials with minimal environmental risk. Materials are received, stored and processed inside a building. There is minimal risk of creating contaminated stormwater. Notwithstanding the stormwater detention pond will be lined with an HDPE liner.
11	Traffic (volume and vehicle movements)	Feedstock will be delivered to the facility by covered semi tipper and B-Double trucks. The number of truck movements will initially be less than 12-15 movements per day and only during daylight hours. At full capacity with three working shifts, this will increase to approximately 30 -40 movements per day. This represents a small proportion of the existing truck movements on Albany Highway. The trucks will only utilise the sealed section of Crossman Road and the design of the turnoff into Crossman Road will be agreed with Main Roads WA.
12	Establishment of view corridors needed	The facility will be screened from Albany Highway by existing vegetation and additional tree screens are proposed to be planted. The facility will comprise agriculture scale sheds in a pale green colour to ensure that the buildings are of low reflectivity and blend into the rural environment. The office will initially comprise a transportable building until the permanent office is built. A decision may be made to build the final office from commencement. The transportable building will then be used as a training and meeting area.
13	Community consultation needed	The proponents approached neighbours regarding the proposed facility early in 2015 (25 January), to introduce the project and provide information. Phone calls and emails were used to provide information, with offers to meet and discuss the details of the project. In addition, the DER interim Works Approval process includes a public consultation period, with advice sought from key stakeholders and decision makers. Suggestions made during this process have been used to improve the proposal, which has been welcomed by the project team. The Shire of Boddington was consulted early in the planning process and has provided valuable advice and guidance. The Shire has a statutory consultation process where applications are advertised for public comment for 21 days (the current process).
14	Insufficient information	Extensive assessment and planning information, including a Works Approval application has been provided to the DER and Shire of Boddington, most of which has been available for public perusal. The DER, in particular require comprehensive risk assessment and description of processes, equipment and management practices to ensure that the operation can be undertaken without unacceptable emissions and without effecting neighbours and the environment. Documentation relating to the DERs decision process and conditions set for the facility have been made public.
15	Presence in a rural area/ Appropriateness of zoning and designation of 'Industry - Rural' vs 'Industry - Noxious'	The proposal documentation originally classed the operation as a 'Industry -Rural ' as the process would be adding value to an agricultural product for agricultural, gardening and horticultural purposes. The Shire of Boddington has decided to consider the proposal under the designation of 'Industry - Noxious' as the Local Planning Scheme is flexible enough to allow for this type of use in the 'Rural' zone, where it can be demonstrated that impacts can be adequately managed. It is important to note that the proposed operation is relatively benign when compared with noxious industries such as abattoirs, fat rendering plants, fellmongeries, tanneries and flock factories. The proposed operation does not involve the use of dangerous chemicals or processes. The enclosed nature of the facility and the extensive environmental controls mean that the development can be implemented successfully without creating unacceptable off-site impacts. Prior to selection of the Lyster's property as the preferred site, BBPL sought the advice from Shire of Boddington, who reviewed the proposal against its policies and indicated it was suitably zoned and the proposal was consistent with Council planning policy.
16	Need for environmental impact assessment	The proposal was referred to the DER, which determined that in view of its relatively small scale and low level of environmental impact, the project could be assessed under the licensing provisions of Part V of the <i>Environmental Protection Act 1986</i> . The DER interim Works Approval process involves extensive environmental impact assessment and documentation. The Works Approval application documentation includes an Environmental Noise Survey, detailed information about the site, consideration and management of issues and details of how issues will be addressed. Planning has included the preparation of an Odour Management Plan, dust suppression regimes, facilities plan and development of operational processes.
17	General aesthetics (visual)	The facility will comprise a modern well designed insulated steel shed of a scale comparable to a large rural shed. The process buildings will be clad in a pale green colour bond to ensure it blends in with the landscape. The facility will be screened by existing trees (dense in some areas) and the site will be landscaped with additional trees to improve visual amenity from Albany Highway and Crossman Road.
18	Tourism and local economy	This is relatively small scale project which will operate to high environmental standards. As the facility will be a research facility in addition to operating as commercial production facility, it is likely to result in additional visitation to the area and therefore have a positive impact on tourism in the area as an innovative industry. It is considered that the project will not be detrimental to the tourism industry in the Shire of Boddington as it will be visually unobtrusive and operate using best practice methodologies to prevent noise, dust and odour. The product is a clean green fertiliser that adds value to what is other wise a waste product. The project will initially only employ 8 persons but this will increase to up to 50 people at full production when considering external contractor involved in transport, logistics and maintenance. It is expected that this will provide employment for local people and potentially bring new people to the Shire of Boddington. This will have flow on benefits for local businesses. The proponent plans to work with the Shire to establish suitable housing for the workers and their families, where needed.
19	Property values	The proposal is of relatively small scale and will operate to high environmental standards. It is visually unobtrusive and there is no reason to believe it would have detrimental impacts on the amenity of the surrounding area. Previous experience with projects of this type and scale indicates that the overall health of the district's economy is actually likely to improve property values due to additional economic inputs and incorporation of a greater diversity in the rural sector.

Submission No.	Issue	Response
20	Development Assessment Panel	A DAP can consider mandatory applications which have an estimated cost of more than \$7 million and which are not an excluded development type. Applications with a value of between \$3 million and \$7 million are optionally able to be considered by DAPs. The application currently being considered has a value of less than \$7 million.
21	Setting of conditions for monitoring operation	The DER Works Approval process has set conditions for the construction and commissioning of the proposed facility. Subsequent to finalisation of construction, DER will set conditions for the licencing of the facility under Part V of the EP Act. Conditions will relate to management of operations and will include monitoring and reporting requirements.
22	Risk of explosion or industrial accident	This project is based on natural animal manure feedstocks and inert materials. The only flammable agent on-site will be diesel fuel which will be stored in a purpose built storage facility. There are no materials or equipment that will be used in the plant that are at high risk of explosion. In addition, there will be a high standard of construction to meet modern construction standards which will minimise the risk of industrial accidents. Safety features will be built into the system, as is required of any processing project.
23	Impacts on local business	The Boddington Natural Fertiliser Project will have a positive effect on the local businesses in the Shire of Boddington. During the initial construction phase, worker accommodation will be needed as close to the site as possible. Materials and stores will be sourced, where possible from within the local area. At full capacity, there will be a need for approximately 50 workers, all of whom will most likely live locally (within half an hour of the facility) and support local businesses.
24	Health concerns	No noxious chemicals will be used in the process. In addition, the ventilation system within the sheds will prevent dust emissions from leaving the processing area. Dust from vehicle movements will be suppressed through treating the internal road with magnesium chloride (DustMag). It is extremely unlikely that there will be any health risks associated with the operation.
25	Setting a precedent for other Rural - Industry activities	We understand that the rural sector across Western Australian needs to diversify and add value to agricultural products. This will be essential to maintain viable communities in regional areas. The establishment of well run, sustainable and progressive industries in rural sectors needs to be encouraged.
26	Lack of power and water on proposed property	The property will have adequate power supply either via the Western Power grid or through installation of two 250KVA package unit generator sets. Sufficient water is available for use in the proposed operation (as virtually no water is required for the process). Planning has been undertaken for the operation to be as self sufficient as possible for water and power, including the introduction of solar battery technology and the installation of dams to provide water.
27	Department of Water - Drainage management	Stormwater infrastructure for runoff from hard stands and roads will be designed and constructed in order to be consistent with the <i>Stormwater Management Manual for Western Australia</i> (DoW, 2004 - 2007) and the <i>DoW Water Quality Protection Note 52: Stormwater Management at Industrial Sites</i> .
28	Shire of Wandering declined to comment on the Proposal	Noted.
29	The Shire of Williams has no objections to the proposal, as long as the project meets planning requirements and will not adversely impact on the amenity of the locality	Other than planning approval from the Shire of Boddington, the main approval required is from DER under the EP Act. The DER has undertaken an extensive assessment and has set conditions in relation to the construction and operation of the facility. The DER are satisfied that the proposed facility will adequately manage impacts and that there is not a risk to neighbours or the environment.
30	The Shire of Williams requested that submissions from Shire of Williams residents be considered	Noted.
31	Clarification regarding the input products sources and how this relates to the designation of 'Rural Industry' (i.e. 'primary product from the locality')	The Shire of Boddington has advised that it will consider the project as 'Industry - Noxious' which allows for industries in rural areas. It is important to note that the proposed operation is relatively benign when compared with noxious industries such as abattoirs, fat rendering plants, fellmongeries, tanneries and flock factories. The proposed operation does not involve the use of dangerous chemicals or processes. The enclosed nature of the facility and the extensive environmental controls mean that the development can be implemented successfully without creating unacceptable off-site impacts.

Submission No.	Issue	Response
32	Examples of State Administrative Tribunal decisions for 'Industry - Rural'	The proposal documentation originally classed the operation as a 'Industry -Rural ' as the process would be adding value to an agricultural product for agricultural, gardening and horticultural purposes. The Shire of Boddington has decided to consider the proposal under the designation of 'Industry - Noxious' as the Local Planning Scheme is flexible enough to allow for this type of use in the 'Rural' zone, where it can be demonstrated that impacts can be adequately managed. It is important to note that the proposed operation is relatively benign when compared with noxious industries such as abattoirs, fat rendering plants, fellmongeries, tanneries and flock factories. The proposed operation does not involve the use of dangerous chemicals or processes. The enclosed nature of the facility and the extensive environmental controls mean that the development can be implemented successfully without creating unacceptable off-site impacts. Prior to selection of the Lyster's property as the preferred site, BBPL sought the advice from Shire of Boddington, who reviewed the proposal against its policies and indicated it was suitably zoned and the proposal was consistent with Council planning policy.
33	Bush Fire - Part of the subject land are bushfire prone - due regard for State Planning Policy 3.7 - Planning in Bushfire Prone Areas	The facility will comply with requirements in relation to construction in a Bush Fire prone area.
34	Aboriginal Heritage	The proponents are aware that while the subject land does not contain any sites listed under the <i>Aboriginal Heritage Act 1972</i> , there are obligations to protect any sites that may be discovered by following the <i>State's Cultural Heritage Due Diligence Guidelines</i> , which will be incorporated into the planning for the construction phase.
35	From the Department of Environment Regulation: DER has undertaken an assessment of the proposal and intends to grant a Works Approval (with conditions) once planning approvals are in place.	Noted.
36	Department of Agriculture and Food - No objection	Noted.
37	Main Roads WA - The access route needs to be Restricted Access Vehicle (RAV) rated to consider suitability of the route. Recommend lodging Heavy Vehicle Services application. Improvements may be required for existing intersection of Albany Highway/ South Crossman Road, pending assessment.	The proponents understand that should the Shire of Boddington support the proposal, that an application will need to be lodged with the MRWA Heavy Vehicle Services for RAV assessment.
38	Department of Mines and Petroleum - The project raises no significant issues relating to mineral and petroleum resources, geothermal energy or basic raw materials.	Noted.

Submission No.	Issue	Response
39	Peel Harvey Catchment Group - Proposal should be able to manage all environmental impacts - some comments regarding stormwater and groundwater management, compliance and incident reporting, monitoring, odour, planting of indigenous plants and weed management. Preparation of Environmental Management Plan.	The facility will include drainage management for the stormwater collected from roofs which will be clean and suitable for reuse on the site. Stormwater will be captured from external hardstand areas and directed to a lined pond to prevent leaching to the environment. The DER licencing process will include requirements for annual reporting, incident reporting and monitoring. DER will be the responsible regulator for most matters in relation to the operation. Neighbours will have opportunities to interact with the operation, including if they need to lodge a complaint. Complaints will be recorded and followed up to ensure that an adequate response is provided to complainants, including measures to address complaints. The property around the facility will be maintained as a working farm, which will include weed management. Planting for landscaping will include local native species, with consideration of fire risk, where appropriate. Documentation such as Environmental Management Plans which are required by DER and the Shire of Boddington will be prepared in good faith and implemented as appropriate.
40	Other matters	
41	Strategic Location	The site is strategically located to receive feedstocks from the north, south and west and then deliver fertiliser to the Wheatbelt areas to the east. This produces a sustainable outcome by minimising transport and value adding to the natural manures produced in the south-west of the State.
42	Natural materials and organic certification	The process will take natural manure feedstocks and add value to them using simple physical processes. The fertiliser pellets will be bound with a natural mineral binder and trace elements will be added to produce balanced fertiliser products. No hazardous chemicals are used in the process and BBPL is seeking organic certification for its products.
43	Scale	Opponents of the proposal have suggested it will have massive visual and environmental impacts. In reality, this is a small scale facility consistent with the rural nature of the area. While it is located on 40 ha of land, the facility could easily have been sited on 10 ha as it has a small footprint. The main production shed and associated infrastructure are nominally 70 m x 70 m in dimension. The scale of this facility is similar to the sheds and house already on the Lyster's property.
44	Simple natural process	It has been suggested that the manufacturing process is large and complex and involves either chemical processes or composting. This is not correct. The processes involved in producing the biofertiliser are simple and based on equipment commonly used on farms to produce stock feeds or handle fertilisers. The processes include milling to reduce the particle size of feedstocks, mixing, drying, pelletising and packaging.