



**Licence No. 51656**

**THOMAS FOODS  
INTERNATIONAL MURRAY  
BRIDGE PTY LIMITED**

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**ISSUED:**  
10 Nov 2022

**EXPIRY:**  
31 Oct 2027

**ACN:**  
085 672 457

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Environmental Authorisation  
under Part 6 of the  
*Environment Protection  
Act 1993*

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**South Australian  
Environment  
Protection Authority**  
GPO Box 2607  
Adelaide SA 5001  
Tel: 08 8204 2004

EPA



# Environment Protection Authority



**LICENCE NUMBER** 51656

## LICENSEE DETAILS

Licence Holder: THOMAS FOODS INTERNATIONAL MURRAY BRIDGE PTY LIMITED  
ACN: 085 672 457  
Registered Address: 191 Temora Way, PALLAMANA SA 5254

## LICENSED ACTIVITIES

The Licensee is authorised to undertake, at the location(s) shown above, the following prescribed activities of environmental significance under Schedule 1 Part A of the Act, subject to the conditions in this Licence.

6(1)	Meat processing works
8(2)(a)	Fuel burning not coal or wood

## TERMS OF LICENCE

Commencement Date: 10 Nov 2022  
Expiry Date: 31 Oct 2027

## PREMISES ADDRESS

191 Temora Way, PALLAMANA SA 5254

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## Licence Explanatory Notes – Do Not Form Part of the Licence

### Compliance with this licence

The EPA seeks to ensure that all reasonable and practicable measures are taken to protect, restore and enhance the quality of the environment according to the principles of ecologically sustainable development. To achieve this objective, the EPA uses a number of regulatory decision making principles and actions outlined in the 'Compliance and enforcement regulatory options and tools' document available on the EPA website.

### Notification – serious or material environmental harm caused or threatened

If serious or material environmental harm from pollution is caused or threatened in the course of an activity, the licence holder must, as soon as reasonably practicable after becoming aware of the harm or threatened harm, notify the EPA (preferably on EPA emergency phone number 1800 100 833) of the harm or threatened harm, its nature, the circumstances in which it occurred and the action taken to deal with it in accordance with section 83 of the [Environment Protection Act 1993](#) (the Act). In the event that the primary emergency phone number is out of order, the licence holder should phone (08) 8204 2004.

### Variations, transfers and surrender of a licence

The EPA may impose or vary the conditions of a licence by notice in writing to the licence holder in accordance with sections 45 and 46 of the Act. Public notice may be required where the variation of licence conditions results in a relaxation of the requirements imposed for the protection or restoration of the environment and results in an adverse effect on any adjoining land or its amenity.

If a licence holder wishes to vary the conditions of a licence, transfer a licence to another entity, or surrender a licence, the licence holder must submit an application to the EPA in accordance with the applicable provisions of the Act (sections 45, 49 and 56, respectively). A licence remains in effect and in its original form until such time as any proposed variation, application for surrender, or transfer has been made and approved in writing by the EPA.

### Suspension or cancellation of a licence

The EPA may suspend or cancel a licence by notice in writing to the licence holder in accordance with section 55 of the Act if satisfied the licence holder has either obtained the licence improperly, contravened a requirement under the Act or if the holder is a body corporate, a director of the body corporate has been guilty of misconduct of a prescribed kind (whether in this State or elsewhere).

### Responsibilities under Environment Protection legislation

In addition to the conditions of any licence, a licence holder must comply with their obligations under all State and Federal legislation (as amended from time to time) including: the [Environment Protection Act 1993](#); the [Environment Protection Regulations 2009](#); all Environment Protection Policies made under the [Environment Protection Act 1993](#); and any National Environment Protection Measures not operating as an Environment Protection Policy under the [Environment Protection Act 1993](#)

### Public Register Information

The EPA maintains and makes available a Public Register of details related to its determinations and other information it considers appropriate (i.e. excluding trade processes or financial information) in accordance with section 109 of the Act. These details include, but are not limited to:

- licensing and beverage container applications and approvals
- enforcement actions
- site contamination
- serious or material environmental harm caused or threatened in the course of an activity
- environment improvement programmes and environment performance agreements
- environment assessment reports; results of testing, monitoring or evaluation required by a licence
- EPA advice or direction regarding development approvals referred to the EPA by a planning authority

## Definitions

Unless the contrary intention appears, terms used in this licence that are defined in the Act (including any regulations or environment protection policies made pursuant to the Act) have the respective meanings assigned to those terms by the Act.

**THE ACT:** The *Environment Protection Act 1993*

**PREMISES:** The whole of the land comprised in Titles Register - Certificate of Title, Crown Lease and Crown Record.

CT5320/898

CT6264/411

CT6264/413

CT6270/135

**AUTHORISATION FEE PAYMENT DATE:** means the anniversary of the grant or renewal of this authorisation.

**CONTAMINATED STORMWATER:** is as defined in the Environment Protection (Water Quality) Policy 2015.

**EMERGENCY SPILL KIT:** means a kit containing materials that when used would prevent and/or minimise listed waste from entering the stormwater or groundwater system in the event of a spill.

**ENVIRONMENTAL HARM:** means the same as is defined in section 5 of the Environment Protection Act 1993.

**PAHL FARM:** is defined as the property which includes CT 6264/412 and CT6270/135.

This property forms part of Authorisations 11649 and 51656.

**POLLUTION CONTROL EQUIPMENT:** means 'control equipment' as defined in the Environment Protection (Air Quality) Policy: any device that controls, limits, measures, records or indicates air pollution.

**SENSITIVE RECEPTOR:** means a fixed location such as a house, building, other premises or open area where health, property or amenity is affected by emissions that increase the concentration of the emitted parameter above background levels.

**SLUDGE:** means a semi-solid (solid with a high-water content) substance derived from a wastewater treatment process.

**STORMWATER:** is as defined in the Environment Protection (Water Quality) Policy 2015.

**WASTE:** means -

1. As defined under the Environment Protection Act 1993,

1(a) any discarded, dumped, rejected, abandoned, unwanted or surplus matter, whether or not intended for sale or for purification or resource recovery by a separate operation from that which produced the matter; or

1(b) any matter declared by regulation to be waste for the purposes of this Act (following consultation by the Minister on the regulation with prescribed bodies in accordance with the regulations); or

1(c) any matter declared by an environment protection policy to be waste for the purposes of this Act,

whether or not of value.

2. However, waste does not include—

2(a) an approved recovered resource whilst it is being dealt with in accordance with the declaration of that resource—see section 4A; or

2(b) anything declared by regulation or an environment protection policy not to be waste for the purposes of this Act,

even though the resource or the thing so declared might otherwise, but for the declaration, fall within the definition of waste in subsection (1).

**WASTEWATER:** as defined in the Environment Protection (Water Quality) Policy 2015.

**WASTEWATER MANAGEMENT SYSTEM:** as defined in the Environment Protection (Water Quality) Policy 2015.

**WATERS:** is as defined in the Environment Protection (Water Quality) Policy 2015.

### **Acronyms**

**EPA:** means Environment Protection Authority

**AS:** means Australian Standard.

**ISO:** means International Organisation for Standardization.

**NATA:** means National Association of Testing Authorities.

**SOER:** means Specific Odour Emission Rate

## Conditions of Licence

The Licensee is authorised to conduct the prescribed activities as described in this Licence at the Premises nominated, subject to the following conditions:

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### 1 CONTROL OF EMISSIONS

#### 1.1 DUST PREVENTION (S - 7)

The Licensee must take all reasonable and practicable measures to prevent dust from leaving the Premises.

#### 1.2 FLARING EQUIPMENT (U - 1561)

The Licensee must ensure the flaring equipment to burn biogas generated by the covered anaerobic lagoons has sufficient combustion such that the potential for smoke and odour generation is minimised as far as practicable.

#### 1.3 NOISE PREVENTION (S - 136)

The Licensee must take all reasonable and practicable measures to prevent noise from leaving the Premises.

#### 1.4 RECYCLED WATER IRRIGATION (S - 161)

The Licensee must, when irrigating recycled water to land at the Premises:

- 1.4.1 prevent pooling of recycled water; and
- 1.4.2 prevent runoff of recycled water from the Premises.

#### 1.5 STORMWATER (S - 15)

The Licensee must:

- 1.5.1 take all reasonable and practicable measures to prevent contamination of stormwater at the Premises; and
- 1.5.2 implement appropriate contingency measures to contain any contaminated stormwater at the Premises unless and until the contaminated stormwater is treated to remove the contamination, or is disposed of at an appropriately licensed facility.



## **1.6 WASTEWATER (S - 18)**

The Licensee must take all reasonable and practicable measures to prevent wastewater or contaminated stormwater from discharging onto land and/or into waters.

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## **2 WASTE MANAGEMENT**

### **2.1 WASTEWATER MANAGEMENT (S - 53)**

The Licensee must direct all wastewater to the wastewater management system.

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## **3 OPERATIONAL MANAGEMENT**

### **3.1 APPLICATION OF SLUDGE (U - 1570)**

The Licensee must not apply any sludge to land at the licensed premises unless the sludge is applied in compliance with a Sludge Application Management Plan which has been approved in writing by the Authority.

- 3.1.1 The Plan must include, but is not limited to the following:
- a determines the appropriate rate of application of sludge from the licensed activity to land for the purpose of improving the agricultural potential of the soil; and
  - b demonstrates the capacity of the soils and associated vegetation to store and use the organic matter and nutrients from the sludge
- 3.1.2 The Licensee must comply with the approved Plan, or any revised Plan approved in writing by the EPA.

### **3.2 BUNDING (S - 5)**

The licensee must ensure that all chemicals or chemical products are stored, loaded or unloaded in an appropriately bunded area.

#### **NOTES**

The EPA will assess the appropriateness of any bund against the EPA's 'Bunding and Spill Management Guidelines'.

### **3.3 COMMUNITY ENGAGEMENT PLAN (U - 722)**

The Licensee must:

- 3.3.1 develop and implement a Community Engagement Plan in consultation with key stakeholders; and

- 3.3.2 provide public access to the Community Engagement Plan (and any subsequent amended version) by the compliance date listed below.

**Compliance Date: 16-Dec-2022**

#### **3.4 COMPLAINTS REGISTER (S - 1)**

The Licensee must:

- 3.4.1 prepare and maintain a register of all complaints concerning environmental issues.
- 3.4.2 ensure the register includes:
- a the date and time that the complaint was made;
  - b details of the complaint including the likely cause of events giving rise to the complaint;
  - c the contact details of the complainant (if permitted by the complainant); and
  - d details of any action taken in response to the complaint by the Licensee.

#### **3.5 EMERGENCY SPILL KIT (S - 21)**

The Licensee must ensure that an appropriate emergency spill kit is kept on the Premises at all times and is used in the event of a spill.

#### **3.6 IMPLEMENT THE COMMISSIONING PLAN (U - 1542)**

The Licensee must implement and comply with the approved Commissioning Plan or any revised Plan approved in writing by the EPA.

#### **3.7 IMPLEMENT THE ODOUR MANAGEMENT PLAN (U - 1540)**

The licensee must implement and comply with the Odour Management Plan approved in writing by the EPA (or any revised plan approved in writing by the EPA) required by condition U -1511 in accordance with its EPA approved requirements of that plan.

### **3.8 IMPLEMENT THE TRIGGER AND ACTION RESPONSE PLAN (U - 1541)**

The licensee must implement and comply with the Trigger and Action Response Plan approved in writing by the EPA (or any revised plan approved in writing by the EPA) required by condition U -1520 in accordance with its EPA approved requirements of that plan.

### **3.9 ODOUR EMISSION COMPLIANCE (U - 20)**

The Licensee must ensure that odour emissions from the Pahl Farm wastewater ponds, assessed on the basis of odour emission rates, do not exceed a SOER of 0.8 odour units per cubic metre/square metre/second from the surface of the entire pond system, as determined using an odour sampling technique specified in AS 4323.4.2009 and an odour measurement technique specified in AS 4323.3.2001.

### **3.10 ODOUR MANAGEMENT PLAN (U - 1511)**

The Licensee must;

- 3.10.1 Develop and submit, to the satisfaction of the EPA, by the compliance date listed below, an Odour Management Plan;
- 3.10.2 Ensure the Odour Management Plan includes, but need not be limited to:
  - a identification of all potential odour sources at the Premises;
  - b a risk assessment of each odour source identified and the control measures to be undertaken to minimise odour emissions from all odour sources as identified in paragraph a. above; and
  - c details of any management arrangements that will be implemented when operational systems and/or equipment either break down, are undergoing repair or are not operating to design specifications.

**Compliance Date: 16-Dec-2022**

### **3.11 POLLUTION CONTROL EQUIPMENT REGISTER (S - 2)**

The Licensee must:

- 3.11.1 maintain all Pollution Control Equipment to ensure that pollution is minimised; and

- 3.11.2 keep a written record of all inspections of Pollution Control Equipment, which includes:
- a the name of the recording officer;
  - b the date of each inspection of the equipment;
  - c details of the equipment that was inspected;
  - d an assessment of whether the equipment was working effectively;  
and
  - e the action taken (if required) to rectify any faults or failures.

### **3.12 POND 3 AERATION (U - 26)**

The Licensee must ensure that aerators in Pond 3 at the Pahl Farm Premises are only operating when the water level at pond transfer end is at or above the minimum operational depth of 4.2 metres.

### **3.13 TRIGGER AND ACTION RESPONSE PLAN (U - 1520)**

The Licensee must:

- 3.13.1 develop and submit to the satisfaction of the EPA by the compliance date listed below, a Trigger and Action Response Plan (TARP);

- 3.13.2 ensure that the TARP includes, but need not be limited to:
- a the identification of thresholds at which potential or actual environmental harm may occur due to the activity or activities being undertaken at the Premises. In identifying the thresholds required by this condition regard must be given to the following:
    - i environmental pollutants (wastewater, solid waste and odour);
    - ii incidents that may cause potential or actual environmental harm;
    - iii meteorological conditions;
    - iv observations; and
    - v community complaints;
  - b detailed actions and response strategies that will be implemented in the event that the thresholds identified in (a) above are reached or exceeded;
  - c a methodology and framework for quarterly reporting to the EPA, which must include, but need not be limited to:
    - i the date and time one or more thresholds is reached or exceeded;
    - ii actions and response strategies implemented to address the reached threshold or exceedance(s); and
    - iii outcomes of the actions and response strategies; and
  - d a methodology and framework for the provision of an annual report to the EPA which must include, but need not be limited to:
    - i a review of all thresholds identified in this condition;
    - ii a review of the effectiveness of all actions and response strategies identified in this condition;
    - iii a trend analysis of exceedance data generated through analysis of the TARP data collected;
    - iv a review and analysis of community complaints recorded in compliance with condition S-1 with the exceedance of thresholds reported under this condition;
    - v identified opportunities for improvement in environmental management at the Premises; and
    - vi recommendations for amendments to the TARP based on any of the above.

**Compliance Date: 16-Dec-2022**

### **3.14 WASTEWATER COMMISSIONING (U - 1572)**

The Licensee must not use wastewater to commission the covered anaerobic treatment system and any related equipment at the Premises prior to a Commissioning Plan being to the satisfaction of the EPA.

### **3.15 WASTEWATER IRRIGATION MANAGEMENT PLAN (S - 226)**

The Licensee must:

- 3.15.1 develop and submit to the EPA by the Compliance Date specified below, a Wastewater Irrigation Management Plan (WIMP) to the satisfaction of the EPA for the irrigation activity at the Premises;
- 3.15.2 ensure that the WIMP includes, but not be limited to, the following:
  - a a determination of the appropriate rate of application of treated wastewater to land for the purpose of sustainable irrigation and beneficial reuse;
  - b a determination of the infiltration rate and the allowable leaching fraction of each soil type to ensure they will not be exceeded; and
  - c demonstration that the capacity of the soils and associated vegetation to store and use the organic matter and nutrients will not be exceeded; and
- 3.15.3 implement and comply with the WIMP (or any revised WIMP approved in writing by the EPA) upon approval in writing by the EPA.

#### **NOTES**

Guidance on developing a WIMP that meets the standard acceptable to the EPA is provided within the EPA Guidelines document entitled 'Wastewater irrigation management plan (WIMP) - a drafting guide for wastewater irrigators' (updated June 2009).

**Compliance Date: 16-Dec-2022**

### **3.16 WASTEWATER MANAGEMENT SYSTEM (S - 54)**

The Licensee must ensure that:

- 3.16.1 the Premises incorporates a wastewater management system; and
- 3.16.2 the system is effectively operating in respect of any wastewater generated at the Premises while the Premises are being used for the licensed activity.

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## **4 MONITORING AND REPORTING**

### **4.1 SAMPLING AND ANALYSIS REQUIREMENTS FOR MONITORING (S - 73)**

The Licensee must ensure that:

- 4.1.1 sampling of water, wastewater and soil is undertaken by a suitably qualified person.
- 4.1.2 sampling is carried out in accordance with Australian Standard/New Zealand Standard AS/NZS 5667 (parts 1-12) and Australian Standard AS 4482.1-2005 (from 1 June 2013) where applicable.

- 4.1.3 analysis of samples is carried out by either;
- a a laboratory registered by NATA for the analytical procedures being undertaken; or
  - b a laboratory with ISO 9000 series (Quality System) certification.

#### NOTES

Guidance on sampling in accordance with EPA requirements can be found in the EPA Guidelines document entitled 'Regulatory monitoring and testing water and wastewater sampling'.

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## 5 ADMINISTRATION

### 5.1 ANNUAL RETURN AND PAYMENT OF ANNUAL FEES (A - 4)

For the purposes of section 48(2)(a) of the Act, the date in each year for the lodgement of the Annual Return is no later than 90 days before the anniversary of the grant or renewal of the Licence; and

- 5.1.1 For the purposes of section 48(2)(b) of the Act, the date in each year for the payment of Annual Authorisation Fee is the anniversary of the grant of the Licence.

### 5.2 APPROVAL OF OPERATING PROCESSES (A - 6)

The Licensee must not undertake changes to operating processes conducted pursuant to the Licence at the Premises without written approval from the EPA, where such changes:

- 5.2.1 have the potential to increase emissions or alter the nature of pollutants or waste currently generated by, or from the licensed activity; or
- 5.2.2 have the potential to increase the risk of environmental harm; or
- 5.2.3 would relocate the point of discharge of pollution or waste at the Premises.

### 5.3 APPROVAL OF WORKS (A - 5)

The Licensee must not construct or alter a building or structure, or install or alter any plant or equipment, for use of an activity undertaken pursuant to the Licence at the Premises without written approval from the EPA, where such changes:

- 5.3.1 have the potential to increase the emissions or alter the nature of pollutants or waste currently generated by, or from the licensed activity; or
- 5.3.2 have the potential to increase the risk of environmental harm; or
- 5.3.3 would relocate the point of discharge of pollution or waste at the Premises.

#### **5.4 CHANGE OF LICENSEE DETAILS (A - 3)**

If the Licensee's name or postal address (or both) changes, the Licensee must inform the EPA within 28 days of the change occurring.

#### **5.5 IMPOSE OR VARY CONDITIONS (U - 1513)**

The EPA may:

- 5.5.1 at any time during the term of the licence, impose new conditions on this licence or vary the conditions of this licence by notice in writing to the licensee. The conditions may be imposed or varied in response to the EPA's receipt of any of the following plans, or information supplied to the EPA pursuant to any of the plans:
- a Trigger and Action Response Plan (Condition U -1520 and U - 1541);
  - b Odour Management Plan (Condition U -1511 and U - 1540);
  - c Wastewater Irrigation Management Plan (Condition S - 226); and
  - d Commissioning Plan (Condition U - 1542).

#### **5.6 LICENCE RENEWAL (A - 2)**

For the purposes of section 43(3) of the Act, an application for Renewal of the Licence must be made no later than 90 days before the expiry date of the Licence.

#### **5.7 OBLIGATIONS TO EMPLOYEES, AGENTS AND CONTRACTORS (A - 1)**

The Licensee must ensure that every employee, agent or contractor responsible for undertaking any activity regulated by the Licence, is informed as to the conditions of the Licence.

### **Attachments**

There are no documents attached to this licence.