

THE LOCAL MEAT CO PTY LTD – CLAUDE ROAD ABATTOIR CAPACITY INCREASE, CLAUDE ROAD

EER Version 2 (August 2025) – INFORMATION REQUIRED

The Local Meat Co EPA Response

12th Dec 2025

Introduction

This document has been prepared by the applicant to support the EPA’s continued assessment of the proposed increase in throughput at the Claude Road Abattoir. It is intended as an addendum to the Environmental Effects Report (EER) Version 2 submitted on 25 September 2024 and responds directly and exclusively to the additional information requests and clarifications issued by the EPA in its “Summary of Issues – Draft EER Version 2” document.

To avoid unnecessary duplication, this document does not restate the technical assessments, impact analysis, or baseline information already provided in the EER or supporting appendices (including the WIMP, noise assessment, and natural values report). Instead, it provides:

1. **Targeted responses to the EPA’s general comments** relating to management measures for air, noise, water, adverse weather, and contingency situations;
2. **Clear, issue-by-issue responses** addressing each specific query raised under Sections B and C of the EPA’s Version 2 summary table; and
3. **A consolidated Part D summary of all management and mitigation measures**, prepared in accordance with the EPA EER Guidelines.

There are no changes proposed to the operational layout or processing systems of the abattoir. However, since commencing this approval process and in collaboration with State Growth, the applicant will be constructing two small, fully enclosed coolroom additions to the building to improve product flow and staff safety. Both structures sit entirely within the existing developed footprint and do not alter the activity’s environmental risk profile. Plans have been submitted to council including the proposed Level 2 Activity application.

The applicant trusts that the information provided in this document resolves the outstanding matters and assists the EPA in finalising its assessment of the proposal.

Key Issues

EPA Comment:

“There is a general lack of management measures for avoiding, minimising and managing identified environmental impacts, particularly for air, noise and water.”

Proponent Response:

The applicant acknowledges this requirement and has now incorporated a full suite of clearly defined and enforceable management measures for air, noise, and water, consistent with EPA Guidelines Part D. These measures have been refined to reflect the actual risks of this small-scale, low-intensity abattoir, and they are embedded into the commitments listed throughout Part B and summarised comprehensively in Part D – Summary of Management Measures.

The Claude Road Abattoir remains a very small facility relative to other abattoirs, with low volumes of wastewater, no long-term waste storage, an absence of rendering or composting infrastructure, and very short livestock retention times. The revised management measures now demonstrate how all emissions and impacts are avoided at source or fully contained within existing infrastructure.

For air: Handling of Odorous Material & Waste

EPA Requirement:

“Include methods of supply and handling of odorous raw material and solid/liquid waste generated by the activity.”

Proponent Response:

Air emissions and odour risk are inherently low due to the operational model.

Odorous Raw Material Handling

1. The undercover holding yards have a capacity of 212 DSE, equivalent to 212 sheep or 21 cattle, and livestock are held only overnight or processed the same day.
2. Stockyards are fully roofed, preventing wetting and anaerobic odour conditions.
3. All yard drainage flows directly to the solids trap and then to the lined wastewater ponds.
4. Yards are washed out at the end of each day of use (two days per week).

Solid Waste Handling:

1. All solid biological waste (paunch, offal, hides, heads and hocks) is removed fresh daily under Controlled Waste Registration 8326.
2. No waste is stored, stockpiled, composted, or allowed to accumulate.
3. All waste is placed directly into a sealed skip bin.

Liquid Waste Handling:

1. All wastewater is coarse-screened and passes through a gravity-fed system into a solids pit, then to the lined pond system.
2. No liquid waste can come in contact with close-by soils or stormwater.

Management Measures / Commitments:

1. Maintain same-day removal of all solid waste.
2. Keep waste-handling areas clean and free of residues.
3. Ensure all liquid waste enters the solids trap and lined ponds.
4. Maintain lids on bins and sealed containers at all times.

Power Failure / Equipment Malfunction

EPA Requirement

“Consider the potential impacts associated with power failures or malfunction of the equipment used on the site.”

Proponent Response

Power failures and mechanical breakdowns pose significantly greater risks to food safety and product integrity than to environmental emissions. The site has well-established contingency measures to ensure that any disruption does not result in uncontrolled waste discharge or increased emissions.

In the event of a power outage exceeding approximately four hours, a diesel generator is connected to the main switchboard. This restores essential operational functions, including cool-room refrigeration and pressurised water, as the site relies on an onsite tank and electric pressure pump for water supply.

From an environmental perspective, the number of powered systems relevant to emissions is extremely limited:

1. Washdown pump - used for stockyard and floor washdown; wastewater still drains to the solids trap and ponds under gravity if temporarily unpowered.

2. Irrigation pump - operates only intermittently and is not required for containment; irrigation simply pauses during an outage.
3. Skip/hook truck for solid biological waste removal - the only mechanical risk relates to the transport vehicle itself, not site systems. A breakdown does not create an emission pathway because all solid biological waste is stored in sealed containers until collected.

Given the passive nature of the wastewater system (gravity-fed, lined ponds) and the immediate containment of all solid waste in sealed bins, a power failure or vehicle malfunction does not create an uncontrolled emission scenario.

Management Measures / Commitments

1. Maintain access to a suitably sized diesel generator to restore critical functions during extended outages, including the water pressure pump.
2. Suspend irrigation during any power loss and resume only once systems are restored and conditions are suitable.
3. Maintain mechanical servicing of the hook/skip truck to minimise risk of breakdown.
4. Retain an established relationship with a 24/7 on-call diesel mechanic to ensure prompt repair or replacement capacity for the waste transport vehicle.

Management of Emissions in Adverse Weather

EPA Requirement

“Discuss the management of emissions associated with the proposed facility in adverse weather.”

Proponent Response

Adverse weather risks for this facility relate primarily to irrigation and stormwater, as no other part of the operation produces weather-dependent emissions.

Irrigation Controls

1. Irrigation is manually controlled and undertaken only after checking weather conditions.
2. A digital anemometer is used to measure real-time wind speed and direction.
3. Irrigation is prohibited during wind speeds >10 km/h or when winds blow toward neighbouring residences.
4. Irrigation is paused during rain, saturated soils, or temperature inversion conditions.

These measures ensure irrigation is conducted only under suitable conditions, preventing drift or odour transport.

Stormwater Considerations

Adverse weather does not create an emission pathway for wastewater, as clean stormwater is fully separated from the effluent system.

1. Stockyards are fully undercover, preventing any rainfall contact with manure or effluent.
2. Roof water is captured in tanks; if tanks reach capacity during prolonged wet periods, clean overflow drains via an underground PVC pipe to a shallow spoon drain in the paddock, where it disperses naturally before entering the Dasher River.
3. This overflow pathway is completely separate from the wastewater ponds, ensuring stormwater cannot cause pond overtopping or mixing of clean and dirty water.

Given the small scale of the operation and the passive, gravity-fed wastewater system, adverse weather does not create additional environmental risks beyond the irrigation controls already in place.

Management Measures / Commitments:

1. Verify wind speed and direction using a digital anemometer prior to irrigation.
2. Irrigate only under compliant conditions, including wind speeds <10 km/h and winds not blowing toward residences.
3. Use large-droplet irrigation to minimise misting and off-site drift.
4. Suspend irrigation during rain, saturated soils, storms, or strong winds.
5. Ensure stormwater overflow remains directed through the underground PVC line to the spoon drain, preventing interaction with wastewater ponds.

Information required (as per issued Guidelines)

Issue 1

B.1 – Major Equipment

EPA Issue

“Clarify whether there is an aeration blower (still referenced in the noise report). Provide more details of the wastewater management (as opposed to irrigation – e.g. how ponds function) and all associated equipment.”

Proponent Response

There is no aeration blower associated with the wastewater system. Any reference in earlier documentation to an aeration blower was a mistake and is incorrect. The treatment system is a passive, gravity-fed two-pond arrangement supported by coarse screening prior to entry into the primary pond.

Wastewater from throughout the facility gravity-feeds from an in-slab and underground 100mm PVC network to a settling pit. From the settling pit, wastewater flows into the first lined wastewater pond (NE), where solids settle under low-velocity conditions. Once the first pond

reaches its internal overflow point, clarified effluent overflows into the second lined wastewater pond (SW) for further settlement and storage.

When the second pond approaches operational levels, irrigation is undertaken to the adjoining paddocks within the nominated irrigation area. Irrigation is infrequent, typically occurring every 6–8 weeks during the cooler months, and rarely during summer. Irrigation is delivered via a small irrigator powered by an electric pump located between the two ponds. The irrigator uses a large-droplet outlet design, which significantly reduces misting and therefore minimises odour dispersion risk.

Given the small wastewater volumes, extended retention times, and effective passive treatment, there is no requirement for aeration equipment.

Management Measures / Commitments

1. Maintain the passive two-pond system with coarse screening prior to entry.
2. Inspect ponds routinely for freeboard, liner condition, and sludge accumulation.
3. Operate the electric pump between the ponds only under suitable irrigation conditions.
4. Record irrigation events, volumes, and pump operation consistent with the WIMP.

Supporting Information / References

1. EER V2 Section C.1 fig 8 & 9.
2. Pinion Advisory WIMP – pond configuration and hydraulic description.

Issue 2

B.1 – Infrastructure

EPA Issue

“Clarify whether there will be one or more irrigation areas and, if more than one irrigation area, how wastewater will be applied to the different areas. Specify how it will be determined whether the expanded irrigation area shown in Figure 8 will be required.”

Proponent Response

The expanded irrigation area shown in Figure 8 represents the total theoretical area available for irrigation. However, after applying all mandatory buffer zones and exclusion areas identified by Pinion Advisory such as setbacks from boundaries, waterways, and dwellings the remaining usable irrigation area is a single 1.3 ha strip running through the centre of the property, as shown in Figure 9.

Pinion’s assessment includes detailed soil analysis, nutrient monitoring, hydraulic loading capacity, and wastewater characterisation for this specific 1.3 ha irrigation zone. Their

recommendations confirm that this defined area is suitable for sustainable long-term irrigation under the proposed throughput and wastewater volumes.

While the final irrigation hardware layout is still being refined, the applicant anticipates dividing the 1.3 ha area into four irrigable sections. Wastewater irrigation will rotate between these sections on each pumping event, allowing:

- Improved nutrient distribution
- Clear withholding periods for grazing, supported by fencing aligned with each section

This rotational system provides operational flexibility, ensures compliance with agronomic limits, and allows wastewater to be directed to the section that best suits weather conditions at the time of irrigation.

Management Measures / Commitments

1. Limit irrigation to the defined 1.3 ha area established through Pinion’s assessment.
2. Establish and maintain four fenced sections to support controlled rotation and grazing management.
3. Rotate irrigation between sections to meet agronomic and environmental requirements.
4. Maintain accurate irrigation logs noting section used, timing, volume, and weather conditions.

Supporting Information / References

1. Pinion Advisory WIMP—soil testing, nutrient budget, and irrigation capability assessment.
2. Irrigation map (1.3 ha operational area) Figure 9.

Issue 3

B.1 – Planning Permit

EPA Issue

“A planning permit is required under the Planning Act (LUPAA) as the activity is changing to a Level 2 activity. Provide correspondence from Council confirming this.”

Proponent Response

A paid invoice and other correspondence confirming commencement of the planning application process with Kentish Council is attached.

Management Measures / Commitments

1. Proceed with the full planning application process in parallel with EPA assessment.
2. Provide all required supporting documents to Council.
3. Comply with any planning permit conditions relevant to environmental management.

Supporting Information / References

1. Attached Kentish Council planning application invoice.
2. Kentish Council Planning Application Form.

Issue 4

B.2 – Project Description (Activity Area Shapefile)

EPA Issue

“Provide a shapefile for the Activity Area within which the activity will operate and be regulated.”

Proponent Response

A shapefile of the Activity Area has been attached.

Issue 5

B.2.9 – Existing Activity (Stormwater)

EPA Issue

“Describe how stormwater is directed around the site to prevent contamination from stockyards.”

Proponent Response

The stockyards are fully undercover, preventing stormwater from entering or contacting livestock effluent. All washdown water from the lairage area drains directly into a 100mm PVC in-slab and underground drainage pipework connected to the solids trap, then flows into the lined wastewater ponds.

Clean stormwater from building roofs is captured and directed via guttering into storage and/or away from operational areas. No stormwater enters the wastewater ponds, stockyards, or processing areas. Likewise, no wastewater can enter stormwater drains or rainwater overflow pathways, ensuring full separation of clean and dirty water at all times.

Management Measures / Commitments

1. Maintain roofing, guttering, and hardstand surfaces to ensure clean/dirty water separation.
2. Ensure all lairage washdown water flows to the solids trap.

3. Conduct periodic inspections to confirm that no stormwater intrusion occurs into effluent areas.

Issue 6

C.1 – Livestock Numbers & Seasonality

EPA Issue

“Specify proposed livestock numbers, and types, to be processed annually and discuss seasonality in animal processing.”

Proponent Response

Livestock processing volumes are as follows:

- **Cattle:** approximately 1,100 to 1,500 per year
- **Sheep/Lambs:** approximately 6,000 to 10,000 per year
- **Pigs:** 100 to 200 per year
- **Goats:** approximately 300 per year
- **Deer:** 30–50 per year

Seasonality is primarily market-driven, not weather-driven. Demand for service processing exceeds available capacity most of the year and has done since the businesses commencement. Variations can occur when market prices fluctuate greatly, for example, recently elevated lamb prices have reduced throughput to 30% to 50% of normal levels as owners choose to sell them into the market and take advantage of those higher prices versus process them at this facility to sell or eat themselves. However the small scale of the operation and consistent demand for services mean no significant seasonal surges occur.

Management Measures / Commitments

1. Maintain processing volumes within existing operational and environmental capacity.

Issue 7

C.1 – Air Quality - Wind Speed & Irrigation Management

EPA Issue

“Proposed odour mitigation includes not irrigating when over 10km/hr winds. Identify how wind speed will be determined on-site to avoid impacting neighbouring residences (including those to the north-east that are not shown in Figure 7). Include this information in the discussion of site management and mitigation measures.

Proponent Response

The applicant has purchased a digital anemometer capable of measuring on-site wind velocity. Wind speed and direction will be checked immediately before irrigation begins. Irrigation will not occur when wind speeds exceed 10 km/h or when winds blow toward neighbouring residences.

Given the layout of the irrigation area, the only realistic scenario in which irrigation could impact north-eastern residences would be irrigating the far NE corner during a strong south-westerly wind an uncommon wind pattern and totally avoidable situation. Most prevailing winds originate from the north and north-west, directing any potential odour toward native bush at the base of Mount Roland.

The ability to irrigate separate sections of the 1.3 ha irrigation area allows operators to select the section best suited to current wind conditions.

Management Measures / Commitments

1. Measure wind speed and direction with a digital anemometer prior to each irrigation event.
2. Do not irrigate when wind speeds exceed 10 km/h or when winds blow toward residences.
3. Rotate irrigation sections to suit wind direction and minimise odour dispersion.

Supporting Information / References

1. WIMP irrigation trigger guidance.
2. Site wind pattern information and irrigation map.

Issue 8

C.1 – Air Quality - Odour Assessment (For Noting)

EPA Issue

“For noting: The odour emission rates in Table 3 were taken from the documentation concerning (Central Victoria) Livestock Exchange rather an abattoir. These odour emission rates are only partially relevant to abattoirs as they do not include any emissions associated with slaughter and processing of animals

Given that odour emissions associated with the slaughter and processing of animals are likely to significantly increase overall emissions from the activity, the provided odour assessment is considered inadequate. The results of the provided air assessment does not indicate the site will necessarily comply with the relevant Air EPP conditions. No action is required other than to note this.”

Proponent Response

While the EPA observes that odour data from the Central Victoria Livestock Exchange is only partially relevant to this abattoir, it is no more representative of this small, low-intensity facility than an average abattoir would be, given that typical abattoirs include onsite storage, rendering and other high-odour processes that do not occur here. Slaughtering itself is not a significant odour-emitting activity; odour risk at abattoirs typically arises from stored paunch, offal, manure pads, rendering or poorly managed effluent - activities common at larger, conventional plants but not undertaken at this facility.

All solid biological waste (paunch, offal, heads, hides and hocks) is removed fresh daily under Controlled Waste Registration 8326, meaning there is no onsite accumulation and therefore no long-term odour source.

The only operational odour sources at this facility are:

1. Undercover stockyards with very short holding times
2. The solids trap
3. The two lined wastewater ponds
4. Occasional irrigation events

All washdown drains directly to the solids trap and ponds. The ponds have low loading rates and long retention times, resulting in inherently low odour potential. Irrigation is undertaken only under compliant weather conditions and uses a large-droplet system to minimise drift.

Overall, the facility operates at a very small scale with inherently low odour risk, limited to routine wastewater management already addressed in the EER.

Management Measures / Commitments

1. Remove all solid biological waste daily, ensuring no onsite storage of paunch, offal, hides, trim, or condemned material.
2. Maintain undercover stockyards to prevent wetting and anaerobic odour formation.
3. Ensure all washdown drains directly to the solids trap and lined ponds.
4. Maintain low loading rates and pond freeboard, with regular pond inspections.
5. Undertake irrigation only under compliant weather conditions, including wind speeds <10 km/h and winds not blowing toward residences.
6. Use large-droplet irrigation to minimise aerosol drift.
7. Suspend irrigation in adverse weather, including rain, saturated soils, storms or strong winds.

Issue 9

Appendix C – Noise (Map & Photos)

EPA Issue

“Identify all modelled noise sources on a site map. Identify nearest receivers (including those listed in Table 7) on the same figure.”

Proponent Response

A noise map is attached with identification of nearest receivers noting prevailing winds affecting noise and odour.

Issue 10

Appendix C - Noise Assessment Section 3. Proposed Development

EPA Issue

“Provide photos of the existing building structures showing building facades and openings”

Proponent Response

Photos and recently completed draft plans are attached.

Two new small coolrooms have been added to the design (supported by State Growth) and included in the planning submission. Both extensions will be fully enclosed and built on the existing facility footprint, creating no changes to external traffic routes, fencing, trees, or surrounding paddocks.

One extension is positioned on an existing concrete slab and the other replaces a small water tank. Both improvements enhance food safety and staff safety during loading/unloading operations and do not introduce any new significant noise sources.

Management Measures / Commitments

1. Maintain enclosed structures to minimise noise escape.
2. Continue to operate within existing daytime hours.

Supporting Information / References

1. Attached building facade and opening photos.

PART D — Summary of Management Measures

ID	Environmental Issue / Aspect	Management / Mitigation Measure	Trigger / Frequency	Reference
D1	Odour – solid waste	Remove all biological waste fresh daily; no onsite accumulation.	Daily	EER C.6, Issue 6
D2	Odour – stockyards	Maintain fully undercover lairage preventing stormwater contact.	Ongoing	EER B.2.9
D3	Odour – irrigation	Irrigate only <10 km/h wind; measure wind with anemometer.	Each irrigation	Issue 7
D4	Irrigation drift	Use large-droplet irrigator to minimise mist.	Each irrigation	WIMP
D5	Adverse weather	Suspend irrigation during storms, saturated soils, high winds.	As needed	WIMP
D6	Pond odour	Inspect ponds monthly for freeboard and condition.	Monthly	EER C.1
D7	Sludge	Remove sludge every 2–3 years or if >30% depth.	Biennial	WIMP
D8	Noise – hours	Operate only 7:00–15:30.	Daily	EER C.3
D9	Noise – enclosure	Keep external doors closed during noisy operations.	Ongoing	Noise Report
D10	Plant noise	Maintain and repair noisy equipment promptly.	As needed	Noise Report
D12	Wastewater screening	Coarse-screen all wastewater through solids trap.	Continuous	EER C.1
D13	Pond integrity	Inspect liners, banks, freeboard monthly.	Monthly	WIMP
D14	Irrigation area	Irrigate only in defined 1.3 ha area.	Each event	Issue 2
D15	Irrigation rotation	Rotate between four fenced subsections.	Each event	Issue 2
D17	Irrigation logs	Record volumes, weather, wind, location.	Each event	WIMP

D20	Stormwater separation	Maintain gutters and drainage to prevent mixing.	Ongoing	EER C.5
D23	Waste storage	Use sealed skip; clean waste bay daily.	Daily	EER C.6
D24	Waste transport	Transport all controlled waste using TLMC Reg. 8326.	Daily	Part A.6
D25	Biosecurity	Apply NRE Meat & Poultry Standards.	Ongoing	EER C.8
D28	Chemical storage	Store in designated area; maintain SDS.	Ongoing	EER C.9
D31	Traffic hours	Limit truck movements outside daytime where controllable.	Daily	EER C.7
D38	Power failure – wastewater	Use pond freeboard; no irrigation until repaired.	As needed	WIMP
D40	Decommissioning	Remove waste, chemicals, de-sludge ponds, restore pasture.	At closure	EER C.13