

Huon Aquaculture Company Pty Ltd

ABN 865 067 386 109

Parramatta Creek  
Production Increase to 48,000 tpa  
HOG fish products

Notice of Intent  
December 2023



**Prepared by**

Ria Marni Amuno

Processing Environmental Manager

Huon Aquaculture Company Pty Ltd

Phone: 0409 238 257

Email: [ramuno@huonagua.com.au](mailto:ramuno@huonagua.com.au)

## Foreword

This Notice of Intent has been prepared to support a future development application by Huon Aquaculture Company Pty Ltd (Huon) to the Latrobe Council (LC). Huon is the project proponent for the Fish Processing Facility Production Increase Parramatta Creek project.

The application is to increase production at the existing fish processing facility at Parramatta Creek from the currently approved 33,000 tpa to 48,000 tpa of head-on-gutted fish products.

### The purpose of this NOI is to provide:

- supporting documentation to the development application to the LC.
- a basis for the LC and the Board of the Environment Protection Authority (EPA) to consider the planning and environmental aspects of the proposal under the *Land Use Planning and Approvals Act 1993* (LUPAA) and the *Environmental Management and Pollution Control Act 1994* (EMPCA).
- a basis for the conditions under which any approval can be given; and
- a source of information for interested individuals and groups to gain an understanding of the proposal.

This NOI has been prepared in accordance with the EPA Tasmania *Guide for Preparing a Notice of Intent*, March 2023.

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# EMPC Act - Section 27B(2)

## 1 Names and contact details of the person/s lodging the application

### 1.1 *Proponent*

The Proponent for this development is:

**Huon Aquaculture Company Pty Ltd**

### 1.2 *Registered address*

**Huon Aquaculture Company Pty Ltd**

Level 13, 188 Collins Street

Hobart Tasmania 7000

Phone: (03) 6239 4200

Email: [compliance@huonaqua.com.au](mailto:compliance@huonaqua.com.au)

### 1.3 *Name of the person lodging the application to the Council*

**Chloe Lyne**

Planning and Development Consultant

Commercial Project Delivery

Suite 1, Level 1, 178 Charles Street, Launceston, Tasmania 7250

Phone: 0408 397 393

Email: [chloe@cpdelivery.com.au](mailto:chloe@cpdelivery.com.au)

### 1.4 *Name of person/s lodging the NOI*

**Ria Marni Amuno**

Processing Environmental Manager

Huon Aquaculture Company Pty. Ltd

7218 Bass Highway, East Sassafras, Tasmania 7307

Phone: 0409 238 257

Email: [ramuno@huonaqua.com.au](mailto:ramuno@huonaqua.com.au)

**Matthew Whittle**

General Manager Sustainability

Huon Aquaculture Company Pty. Ltd

Level 13, 188 Collins Street, Hobart, Tasmania 7000

Phone: 0438 566 259

Email: [mwhittle@huonaqua.com.au](mailto:mwhittle@huonaqua.com.au)

## **2 Name of proposed project and location**

### **2.1 Project Name**

Huon Aquaculture - Parramatta Creek Production Increase to 48,000 tonnes per annum (tpa) of head-on-gutted (HOG) fish products.

### **2.2 Project location**

Parramatta Creek Processing Facility,  
7216 Bass Highway, East Sassafras  
Tasmania 7307

## **3 Background of the project proponent**

Huon operated as a private company from 1994 until it was listed on the Australian Stock Exchange (ASX) in October 2014. The majority owners, Peter and Frances Bender, purchased the company from Huon Atlantic Salmon Pty Ltd through the reorganisation of a Bender family company in December 1994. The business grew to become the largest privately owned salmon farming operation in Australia.

With the sale to JBS Australia Pty Ltd (JBS) in November 2021, Huon is now part of a global business. JBS is the country's largest meat and food processing company, operating technologically advanced production and value-added facilities and feedlots, whilst also owning Australia's largest smallgoods manufacturer, and operating a leading high-quality meat cutting and case ready production facility. Huon is JBS's first entry into the aquaculture fish protein market and with JBS, Huon has improved certainty and is part of a more diversified food production and supply business.

Huon currently operates eight freshwater sites, multiple marine farms state-wide as well as a processing facility located at Parramatta Creek (PMC). Huon currently employs over 1100 staff (including labour hire) with 859 (FTE) staff employed in Tasmania.

This NOI refers specifically to Huon's PMC Processing Facility located at: **7216 Bass Highway, East Sassafras, 7307**

### **3.1 Proponent's name, contact details, and business number**

#### **Huon Aquaculture Company Pty Ltd**

Level 13, 188 Collins Street

Hobart, Tasmania 7001

Phone: (03) 6239 4200

Web: [www.huonaqua.com.au](http://www.huonaqua.com.au)

ABN: 79 114 456 781

ACN: 067 386 109

## 4 Description of the proposed project

The PMC Processing Facility currently operates as a Level 2 activity under the *Environmental Management and Pollution Control Act 1994* and to the Permit Conditions – Environmental No 9362 granted under the *Land Use Planning and Approvals Act 1993*, as below.

- Municipality: **LATROBE**
- Permit Application Reference: **DA 238/2019**
- EPA file reference: **244900**

Operating under the above approvals, the site functions as a fish processing facility with an approved annual production of 33,000 tpa. This NOI will be seeking approval to increase production to 48,000 tpa of head-on-gutted (HOG) fish products.

The footprint of the processing site will not be expanded under this proposal. Planned modifications in the processing area will be implemented to increase the efficiency of production. Other components related to the production increase will include an increase in traffic to the site both for employees and transport carriers, however, onsite parking area is sufficient for the planned increase in production.

## 5 Location of the project and site map

The PMC Processing Facility is located approximately 25 km southeast of Devonport at Lot 1, 7216 Bass Highway, East Sassafras, Tasmania, 7307. Figure 1 shows the location of the existing processing facility in Parramatta Creek in relation to the region. Access to the site is via a sealed existing roadway off the Bass Highway.



Figure 1. Parramatta Creek processing facility location.

Figure 2 shows the current site map of PMC processing facility. Onsite are two sizable buildings utilised for production, an extensive car park, a wastewater treatment system that includes primary treatment infrastructure, four ponds, an irrigation system. Also onsite is the freshwater treatment plant, maintenance shed and an ice plant.



## **6 Stakeholder consultation process**

Huon will consult with relevant stakeholders including the Latrobe Council and the EPA after the Board has determined the level of the activity proposed in this NOI.

## **7 General description of the physical environment that may be affected by the project**

In accordance with the proposed production increase, no addition to the factory's footprint or production infrastructure is required. No additional land will be cleared for the increase in production to occur, other than a minimal increase in onsite parking which will not require the clearing of vegetation. The current site hardstand areas will be able to accommodate the increase in production within the existing facilities.

### **7.1 Topography**

Huon's processing facility at PMC is relatively flat. The current irrigation area has a gradual slope downwards towards the irrigation area's center, and then the ground slopes upwards to a high point in the property's north-west corner. Several ephemeral drainage lines can be seen at the low point in the middle of the existing irrigation area, especially following heavy rainfall events.

### **7.2 Soils**

The soils on the Huon's PMC processing facility have been previously described by Agricultural Resource Management (2010) and Geo-Environmental Solutions (GES) (2016). Review and assessment of the soil mapping reports were performed to ensure the validity of the results in relation to the topography, known geology of the area, production system, and agricultural land use activities. The soil types identified on the property are Roebuck soil (poorly drained and moderately well-drained), China soil, and Duplex soil.

### **7.3 Climate**

The PMC processing facility is situated in the cool temperate climatic zone. The closest active Bureau of Meteorology weather stations to the site are the Elphin Grove (station number 091171) located in East Sassafras and The Devonport Airport (station number 091126). The Elphin Grove weather station records rainfall only. Temperature data, among others, are recorded at the Devonport Airport weather station.

Rainfall data summary from all the years of measurement indicated a monthly mean from 49.5 to 111.7 mm with the highest amount of rain occurring in July and the least rain happening in December. Utilising all years of data from 1991 to 2023, the mean monthly minimum and maximum temperature range from 4.8 – 12.6 °C and 12.9 to 21.8 °C, respectively.

Dominant winds tend to be from the west-southwest and southeast during summer, autumn, and winter. Winds in spring are pre-dominantly from the west-southwest.

### **7.4 Geology**

Huon's PMC processing facility site consist primarily of Permian mudstone, sandstone, and siltstone beds. Quaternary alluvium is found in the northeastern part of the land, near the Parramatta Creek.

### **7.5 Biodiversity**

The PMC processing facility is located within an area of the site that has been developed and used for industrial and agricultural purposes. The proposed increase in production will be implemented on the current industrial site. No impact on the current surrounding flora and fauna should occur.

The vegetation on and the surrounding land of the PMC facility largely comprise of grasslands. The facility is surrounded by state forest to the north, east, and south; and an orchard on the western side of the Bass Highway. No threatened flora species have been recorded within 500 m of the site.

No terrestrial fauna habitat remains onsite and no threatened fauna species have been recorded within 500 m of the site according to the Natural Values Atlas Report.

## 7.6 Surface water

There are two main watercourses near the PMC processing facility, the Felminghams Creek and the Parramatta Creek, and both are part of the middle Mersey River catchment. Parramatta Creek flows to the east of the property and sourced in forestry land, around 1 km southeast of the site. Parramatta Creek in this area is ephemeral and is sourced in boggy land in the northwest of the property. Felminghams Creek traverses at the west of the processing site on the neighbour's (Layton) land, joining Parramatta Creek downstream of Huon's processing and irrigation areas. As a result, Parramatta Creek receives any run-off, irrigation overflow or seepage from the operation whereas Felminghams Creek receives run-off, irrigation overflow or seepage from the irrigation downstream of the freshwater dam on Layton's land.

Both creeks are classified as slightly to moderately disturbed due to its existing land use within its catchments, according to the ANZECC Guidelines (2000).

## 7.7 Groundwater

Permanent groundwater at Parramatta Creek occurs in and moves through intersecting fractures in Permian-age sedimentary rocks (mudstone, siltstone, sandstone) and in nearby Jurassic-age dolerite to the north-east. These are called hard-rock unconfined aquifers. Groundwater also occurs in the veneer of Quaternary-age alluvium along Parramatta Creek, and, to a lesser extent, along Felminghams Creek and smaller tributary drainage lines. These unconsolidated sediments are intergranular unconfined aquifers.

The relatively low-lying areas adjacent to and including Parramatta and Felminghams creeks are groundwater discharge areas, where upward-moving groundwater is discharged to the surface via evapotranspiration and streamflow. The water table is close to the surface (within a metre or so in monitoring bores on the Huon property) and it fluctuates in response to changing evapotranspiration rates, rainfall, and irrigation.

# 8 Key environmental, health, economic, and social issues

## 8.1 Key environmental issues

### a. Wastewater volume

One of the main environmental concerns related to the increase in production is the site's capacity to manage the effluent volume. The potential environmental receptors impacted by the elevated volume of wastewater are downstream surface waterways, soil, and groundwater.

All wastewater produced in the processing facility undergoes adequate treatment process for the effluent to meet the requirements in the Environmental Permit. The proposed production increase will result in 30% rise in wastewater volume. The dissolved air floatation device (DAF) in the primary treatment is currently operating for 12 hours. The DAF operation hours will be increased to a maximum of 20 hours when required. The aeration, facultative, and settling ponds onsite currently allow a total of 72 days retention time. An increase in wastewater volume in relation to this NOI will decrease the retention time to 52 days. The foreseen retention time is adequate for an effective secondary treatment. In addition, an EPA and Council approved 75 ML dam will be commissioned by July 2024. This additional volume will increase the retention time of the wastewater for a more effective treatment process.

### b. Management of solid and controlled waste

Solid wastes and controlled wastes produced at the facility include solids from the WWTP (solids screening), packaging materials, waste from staff amenities, fish processing wastes and ash from the smokehouses. The amount of solid and controlled waste is expected to increase with the proposed increase in production.

Current waste management practices are adequate and will continue with the production increase. Viscera is ensiled, where the pH value is adjusted to less than 5, to reduce bacterial activity and be suitable for land spreading. The viscera are transported once or twice a day, depending on production volume, to the land-spreading site about 30 minutes away from the PMC processing facility. The transport of viscera is carried out in 22,000 L tankers by a third-party waste transporter. Additional transport may be implemented when required in conjunction with the proposed production increase. Huon intends to construct a rendering facility capable of processing viscera from the PMC processing facility, however, this is a different project with relevant approvals sought separately.

Other production fish waste such as heads, frames, and tails are sold as pet food. Fish waste not accepted as pet food are currently sent to composting facilities. Implementation of these fish waste management strategies will continue in line with the proposed production increase.

Waste minimisation techniques, such as source reduction, recycling, and waste auditing, will continue to be implemented wherever possible to ensure best-practice environmental management. Packing materials and office wastes will continue to be segregated, compacted, and stored in skips for collection by contractors for recycling, reuse, or disposal as appropriate.

### **c. Increase in air emission**

The PMC Processing Facility utilises three smokehouses to produce hot and cold smoked fish products. The smoke generator has a restricted oxygen supply and operates at temperatures between 600 °C and 800 °C so that the Red-gum wood chips do not combust. The resulting smoke then circulates around the product and fresh air is then introduced to displace the smoke in the batch process. The smoking procedure ensures comparable concentrations of oxygen and carbon dioxide to the ambient air, in contrast to the concentrations found in boilers and incinerators during the combustion process.

Stack monitoring is conducted once every two years in accordance with PMC's environmental permit. The latest monitoring data depicted an 18% less in particulate matter in relation to the standard limit. The production increase will not cause exceedances in air emissions from the limit.

There are minor visible emissions of water vapour, both continuous and intermittent, from the hot water and refrigeration cooling tower systems. Their emission is considered environmentally insignificant.

## **8.2 Key health issues**

Figure 3 shows the two sensitive receptors identified in this proposal closest to the PMC processing facility. There are two existing dwellings in the nearby vicinity of the Parramatta Creek processing facility. The nearest existing residential receptor (R1) is the land owned by Mr. Layton that includes the orchard. Second receptor (R2) include the Parramatta Creek rest area and a restaurant now utilised for special events only. R2 is located more than 1 km northwest of the processing facility. Considering the results of the air quality and odour emission studies included in the submission of the Huon PMC Development Proposal and Environmental Management Plan in 2020, it is very unlikely that there would be any future residential or commercial/industrial developments in the immediate surroundings as the land use is predominantly identified as either timber production or timber reserve. Consequently, no additional sensitive receptors have been identified for this proposal.

The distance from the site to nearby identified sensitive receptors and even to transport routes (Bass Highway) precludes the concentrations of any emissions – whether noise, dust, gases, or liquids – from adversely impacting passers-by. Huon maintains that the proposed initiative does not pose any public health risks.

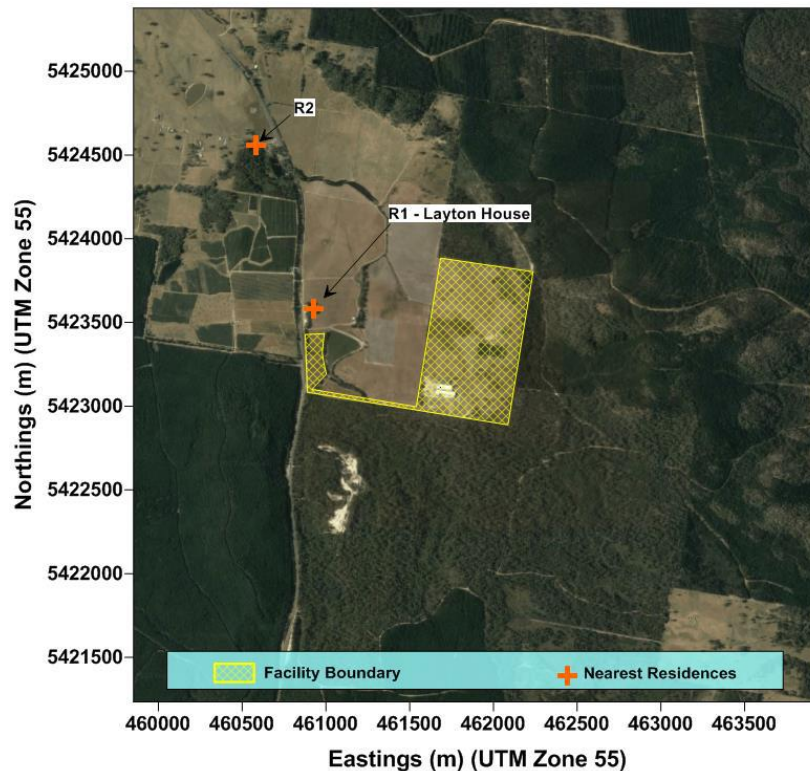


Figure 3. Identified sensitive receptor closest to the Huon Parramatta Creek processing facility (Huon PMC DPEMP, 2020).

### 8.3 Key social and economic issues

The PMC Processing Facility is in the municipal area of Latrobe with a population of 12,420, where 48.7% is male and 51.3% is female according to 2021 data from the Australian Bureau of Statistics (ABS). About 54.6% of the population above the age of 15 is in the labour force and 53.9% of that value work full-time. These data depict a high level of socioeconomic disadvantage with ongoing problems of high rates of welfare receipt and low levels of educational attainment.

Currently, the facility employs 230 – 350 full-time equivalent (FTE) staff. The proposed increase in production will require an estimated 100 – 150 FTE employees to join the PMC team and will result in a positive economic impact on the local community and the economy of the municipality of Latrobe by providing additional means of livelihood to the population. Also, existing employees will receive an increase in job security, thus will prevent future out-migration.

## 9 Surveys and studies proposed or underway in relation to the key issues

Huon is currently undertaking the following activities regarding increased production at the PMC Processing Facility:

- Modelling impacts of production increase on wastewater volume and quality; and air, odour, and noise emissions; and impact on traffic of both employees and transport carriers;
- Construction of a winter storage dam and installation of additional irrigation infrastructure;
- Viability study for desalination system to sustainably manage the incoming high conductivity water;
- Ongoing water quality monitoring and its effect on the receiving environment such as soil, surface water, and groundwater;
- Implementation of more efficient solid waste reduction strategies and management.

## 10 Proposed timetable for the project

The PMC Processing Facility is foreseen to increase its production capacity, as shown in Table 1 below.

Table 1. Proposed production increase with the corresponding financial year.

Financial Year	Amount of HOG (tonne)
2023 - 2024	32,400
2024 – 2025	35,836
2025-2026	39,551
2026-2027	47,877

## EMPC Act - Section 27B(2)(k)

This Notice of Intent (this document) is submitted to the Tasmanian EPA to determine the level of assessment required under the state *Environmental Management and Pollution Control Act 1994* (Tas.) (EMPCA) and to ascertain the assessment process required.

### **1 EPBC Act Approval**

The proposed development will not impact on any protected matter in relation to the EPBC Act.

### **2 EPBC Act Referral**

Huon Aquaculture does not intend to refer the project to the Australian Government for determination as the proposed development will not impact any protected matter.

### **3 Bilateral Agreement made under section 45 of the EPBC Act**

Not applicable.

### **4 LUPA Act**

The proposed production increase will be implemented in the existing fish processing facility owned and operated by Huon located within the boundaries of the Latrobe Municipality. The land use of the site will remain the same. This proposal will be assessed in accordance with the Latrobe Interim Planning Scheme 2013 and is solely within the Rural Resource Zone. The relevant land use under the Planning Scheme will be Resource Processing, being 'Use of land for treating, processing or packing plant or animal resources. Examples include an abattoir, animal saleyard, cheese factory, fish processing, milk processing, winery and sawmilling'. The proposal fits within that definition and will not alter that use.

As the Latrobe Council regarded the production increase proposal as a substantial intensification of the existing activity, a single Development Application under Section 57 Discretionary Application will be submitted to the Council.

### **5 Environmental Licence**

Not applicable.