

Environmental Assessment  
Report  
Tassal Operations Pty Ltd  
**Fish Processing Factory  
Intensification**  
Dover

*March 2026*



ENVIRONMENT PROTECTION AUTHORITY

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## Environmental Assessment Report

Proponent	<b>Tassal Operations Pty Ltd</b>
Proposal	Fish Processing Factory Intensification
Location	Dover
Class of Assessment	2B
PCE/EPN no.	PCE 10627
Permit Application No.	Huon Valley Council DA-65/2024
myDAS Folder No.	EN-EM-EV-DE-256499-001
myDAS Document No.	D23-338380

## Assessment Process Milestones

Date	Milestone
18 December 2020	Notice of Intent lodged
February 2023	Guidelines Issued
19 April 2024	Permit Application submitted to Council
5 August 2024	Referral received by the Board
12 September 2025	Start of public consultation period
10 October 2025	End of public consultation period
23 January 2026	Additional information (Supplement) submitted to the Board
12 February 2026	Date draft conditions issued to proponent
15 March 2026	Statutory period for assessment ends

## Glossary/Acronyms

Term	Detail
Board	Board of the Environment Protection Authority
BOD	Biological Oxygen Demand
CAS	Continuous activated sludge
EIA	Environmental impact assessment
EIS	Environmental Impact Statement
EMPCA	<i>Environmental Management and Pollution Control Act 1994</i>
EMPCS	Environmental management and pollution control system
EPBCA	<i>Environment Protection and Biodiversity Conservation Act 1999 (Cth)</i>
HEPA	Heads of EPA Australia and New Zealand
LUPAA	<i>Land Use Planning and Approvals Act 1993</i>
MBR	Membrane bioreactor
MOPS	Marine operations
NCA	<i>Nature Conservation Act 2002</i>
NEMP	National Environmental Management Plan
NOI	Notice of Intent
NO <sub>x</sub>	Nitrate and nitrite
NGER	National Greenhouse and Energy Reporting
NRE	Department of Natural Resources and Environment Tasmania
PEV	Protected Environmental Values
PTPZL	Permanent Timber Production Zone Land
RMPS	Resource Management and Planning System of Tasmania
RO	Reverse Osmosis
SBR	Sequencing batch reactor
SD	Sustainable development
SMP	Solids Management Plan
TBRG	Tasmanian Biosolids Reuse Guidelines
TKN	Total Kjeldahl nitrogen
TN	Total Nitrogen
TP	Total Phosphorus
TSS	Total Suspended Solids
TSPA	<i>Threatened Species Protection Act 1995</i>
WWTP	Wastewater treatment plant
WWTP SMP	Wastewater Treatment Plant Solids Management Plan

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## Report Summary

This report provides an environmental assessment of the Fish Processing Factory Intensification by Tassal Operations Pty Ltd.

The proposal involves an increase in production limits at the Dover fish processing factory. An increased limit of 50,000 tonnes/year is intended to accommodate long-term growth beyond 2035 and provide flexibility to manage changes in daily and seasonal harvests. The on-site wastewater treatment plant (WWTP) is to be upgraded to take the extra wastewater volume and will include:

- An increase in daily effluent discharge up to a total of 720 kL/day into Port Esperance via the existing discharge point.
- An upgrade to the wastewater treatment plant, including installation of an additional chlorine contact tank, and commissioning of a second screw press for sludge removal.

This report has been prepared based on information provided in the Environmental Impact Statement (EIS). Relevant government agencies and the public were consulted, and their submissions considered as part of the assessment.

**Appendix 1** contains details of matters raised by the public and referral agencies during the consultation process.

**Appendix 2** contains a table of the proponent's proposed management measures.

**Appendix 3** contains the environmental permit conditions

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## I Approval Process

The Board of the Environment Protection Authority (the Board) received a Notice of Intent in relation to this proposal on 18 December 2020.

This proposal is defined as a 'level 2 activity' under clause 4(c), Schedule 2 of the *Environmental Management and Pollution Control Act 1994* (EMPCA), being a fish processing works. As required by section 27(1) of the *Environmental Management and Pollution Control Act 1994* (EMPCA), Tassal Operations Pty Ltd referred the proposal to the Board of the Environment Protection Authority (the Board) on 5 August 2024.

The Board required that information to support the proposal be provided in the form of an Environmental Impact Statement (EIS), prepared in accordance with the Guidelines issued by the Board in February 2023. Several drafts of the EIS were submitted to EPA for review against the Guidelines prior to finalisation and acceptance on behalf of the Board on 24 January 2024.

The final EIS was submitted to Council with the permit application. The EIS was released for public inspection for a 28-day period commencing on 12 September 2025. Advertisements were placed in *The Mercury* and on the EPA website. The EIS was also referred to relevant government agencies for comment. A total of 46 representations were received.

On 30 October 2025, the Board requested that the proponent submit additional information to address matters raised during the public consultation period. Additional information, in the form of a Supplement to the EIS, was submitted by the proponent and accepted by the EPA on 4 February 2026.

## 2 The Proposal

The main characteristics of the proposal are summarised below. A detailed description of the proposal is provided in Section 2 of the EIS.

### Summary of the proposal's main characteristics

#### Activity

Tassal's Dover fish processing factory is allowed under DA-229/2010 (PCE 7861) to produce 25,000 tonnes/year of fish products and discharge 490kl/day of effluent. Subsequently, EPNs have been issued allowing production to be temporarily increased up to 34,000 tonnes/year. with an increase in effluent discharge to 650kL/day.

Tassal proposes an intensification of the Dover fish processing factory to produce up to 50,000 tonnes/year of fish products (being products for commercial sale as food). The increase is proposed to enable Tassal to meet projected productivity improvements from Tassal's existing fish farming areas and to provide operational flexibility to accommodate daily and seasonal harvest variability.

To support the increased processing capacity, the on-site Wastewater Treatment Plant (WWTP) will be upgraded resulting in an increase in the maximum effluent discharged from current volumes of 650kL/day to 720kL/day. The WWTP will also receive and treat wastewater from both the Dover operations and a maximum of 22kL/day of brine from a separate potential reverse osmosis (RO) development at Tassal's Triabunna rendering facility.

The WWTP is to be upgraded to help the site meet wastewater quality limits. Construction activities for the WWTP upgrades include:

- Preparation of level construction areas
- Construction of cast in situ reinforced concrete foundations
- Installation of precast tanks or precast post-tensioned panels on the concrete foundation
- Installation of membrane cassettes and internal piping and pumping systems for the membrane filtration system
- Installation of electrical supply, piping and instrumentation, including pumps, valves, etc. to incorporate the membrane system into the overall treatment process, and
- Integration of new control systems.

The existing wastewater discharge pipe and diffuser (located about 2.7km offshore in Port Esperance and at approximately 30m depth) will continue to be used. No construction works are proposed in the marine environment.

#### Location and planning context

<b>Location</b>	564 Narrows Rd, Strathblane, as shown in Figure 1
<b>Land zoning</b>	Rural Resource, Huon Valley Interim Planning Scheme 2015
<b>Land tenure</b>	Private freehold (11.3ha), Forestry Tasmania lease (PTPZL), Crown lease (casement)

#### Activity site

<b>Land Use</b>	Tassal land is used for fish processing and contains a fish processing factory, WWTP, wharves and pontoons, and office facilities. Site plans showing existing infrastructure, and existing and proposed WWTP infrastructure, are at Figure 2 and Figure 3.
<b>Topography</b>	Site topography ranges from 0 m AHD at the waterfront to approximately 40 m AHD at the WWTP. The topography around the existing factory site has been modified for construction of the existing buildings, roads, and car parks. The WWTP is within a slight valley, separated by a ridgeline from Meads Creek, which forms the western boundary of the site. A ridgeline (around 90-100m ASL) separates the site from the nearest neighbour to the west.

<b>Geology</b>	The site geology consists of Jurassic era dolerite with locally developed granophyre.
<b>Soils</b>	Soils consist of intersected clays and sands overlying coarser materials such as gravelly sands and sands with gravel. The proportion of cobbles and boulders increases with depth. Soils are mapped as moderately permeable and moderately well-drained.
<b>Hydrology</b>	The site is in a coastal location, with rainfall runoff flowing to the coast of Port Esperance. Meads Creek flows to the west of the site to Meads Bay; a ridgeline separates the creek from the WWTP and factory.
<b>Natural Values</b>	The proposed WWTP upgrades are within an existing cleared area that does not include any remnant vegetation communities or suitable habitat for rare or threatened flora or fauna species.

### Location region

<b>Climate</b>	Dover has a cool temperate climate, characterised by low humidity and four distinct seasons with cold winters and warm summers. Mean annual rainfall is approximately 875.8mm. Wind direction varies from predominantly westerly in the mornings to westerly and easterly in the afternoons.
<b>Surrounding land zoning, tenure and uses</b>	The site is located adjacent to Port Esperance with the area surrounding the discharge pipe zoned Environmental Management. The land-based portion of the development is surrounded by Forestry Tasmania land. Residential premises and the Hope Island recreation area are located, respectively, 1.3km and 1.6km from the development.
<b>Species of conservation significance</b>	Small remnants of <i>Eucalyptus ovata</i> forest occur along Mead Creek at the north-west of the site, and either side of the access road to the WWTP. Tasmanian devil, eastern quoll, and eastern barred bandicoot likely use intact vegetation on the site.  Verified sightings of four species were made within 5 km of the discharge point, including humpback whales, New Zealand fur seal, subantarctic fur seal and southern elephant seal. Surveys for the handfish species, Gunn's Screw Shell and Tasmanian live-bearing sea star did not find evidence of these species inhabiting the area. No habitat-forming giant kelp was observed.

### Proposed infrastructure

<b>Major equipment</b>	The preferred wastewater treatment option is to use a MBR process. If this is not suitable a continuous activated sludge (CAS) process or second sequencing batch reactor (SBR) would be used. Potential new equipment would be 'bolted on' to existing equipment and may include additional treatment tanks (pre-cast), new membrane filtration units and, if required, a clarifier or SBR tank.
<b>Other infrastructure</b>	Installation of additional pumps and piping.

### Inputs

<b>Water</b>	Water will be required for wet commissioning of the WWTP, in-situ construction of concrete foundations, and plant and equipment washdown. Water is sourced from an in-stream dam on Meads Creek.
<b>Energy</b>	The site is serviced with power that can be supplemented by a diesel generator.
<b>Other raw materials</b>	Imported engineered, clean fill.

## Wastes and emissions

<b>Liquid</b>	The proposal seeks to increase the wastewater discharge limit from the 650kL/day temporary limit to 720kL/day. Treated wastewater is discharged to Port Esperance.
<b>Atmospheric</b>	Odour emissions from management of fish by-products and wastewater.
<b>Solid</b>	Recyclable and non-recyclable mixed waste from the factory, including packaging, used PPE, office waste and other mixed waste. Construction waste including packaging, excess construction materials.
<b>Controlled wastes</b>	Waste engine oil and lubricants, fish by-products from the fish processing factory, WWTP solids and sludge.
<b>Noise</b>	Construction noise, increased vehicle (heavy and light) movements.
<b>Greenhouse gases</b>	Estimated increase in GHG emissions at the 50,000 tonnes/year production is approximately 159.3 t CO <sub>2</sub> -e (28% increase over existing production levels of 34,000 tpa) derived from increased transport, refrigeration and LPG consumption. No ozone depleting substances will be used at the facility.

## Construction, commissioning and operations

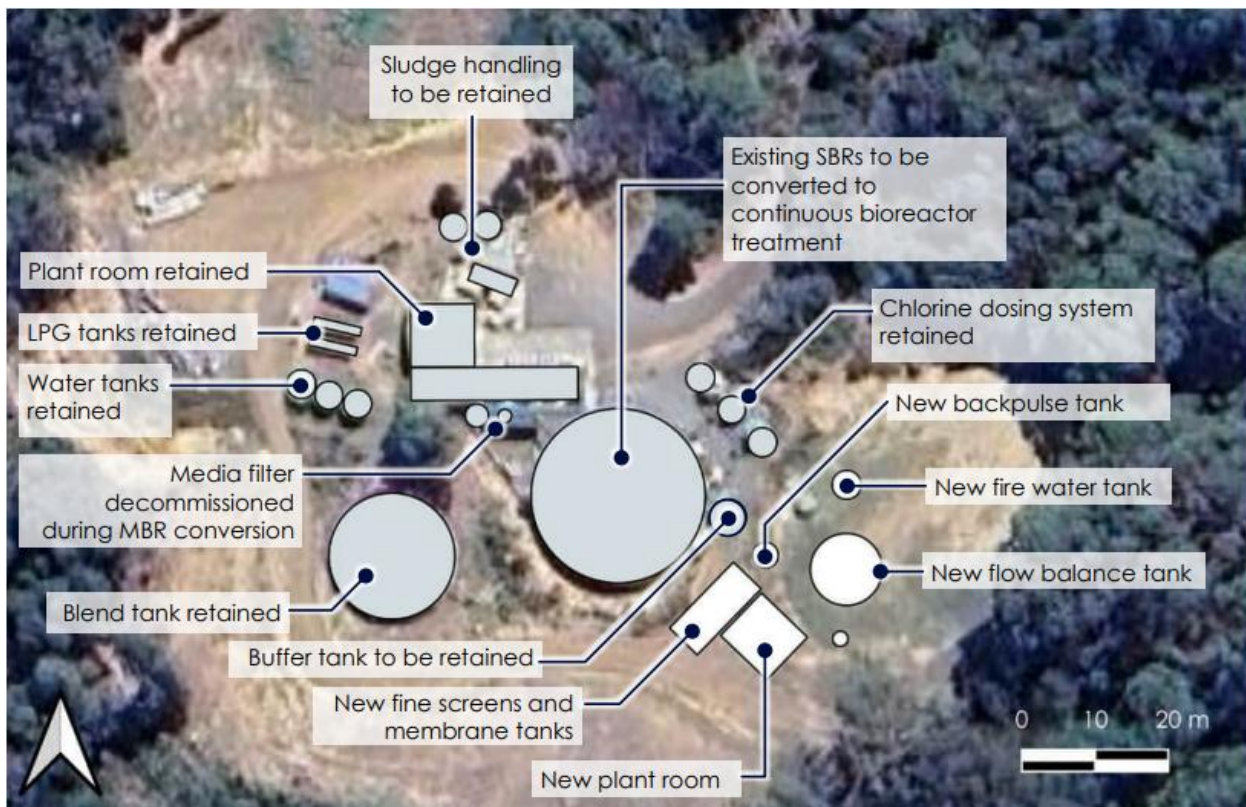
<b>Proposal timetable</b>	Construction is expected to commence upon gaining approvals. The lead time from initiation of the upgrades to commissioning is estimated to be two years.
<b>Operating hours (ongoing)</b>	Operating hours will vary throughout the year depending on market demand and production. Typical operating hours: Fish offload: 1900 to 0300 hours Factory cleaning: 1500 to 2300 hours Processing: 0900 to 1900 hours; 2300 to 0900 hours (two shifts)



Figure 1: Location of the Dover fish processing factory (Figure 2 of the EIS)



**Figure 2: Site plan (Figure 8 of the EIS). (Note the WWTP is located to the south of the factory.)**



**Figure 3: Existing and proposed WWTP infrastructure (Figure 23 of the EIS).**



Figure 4: Dover facility (Biosecurity Management Plan).

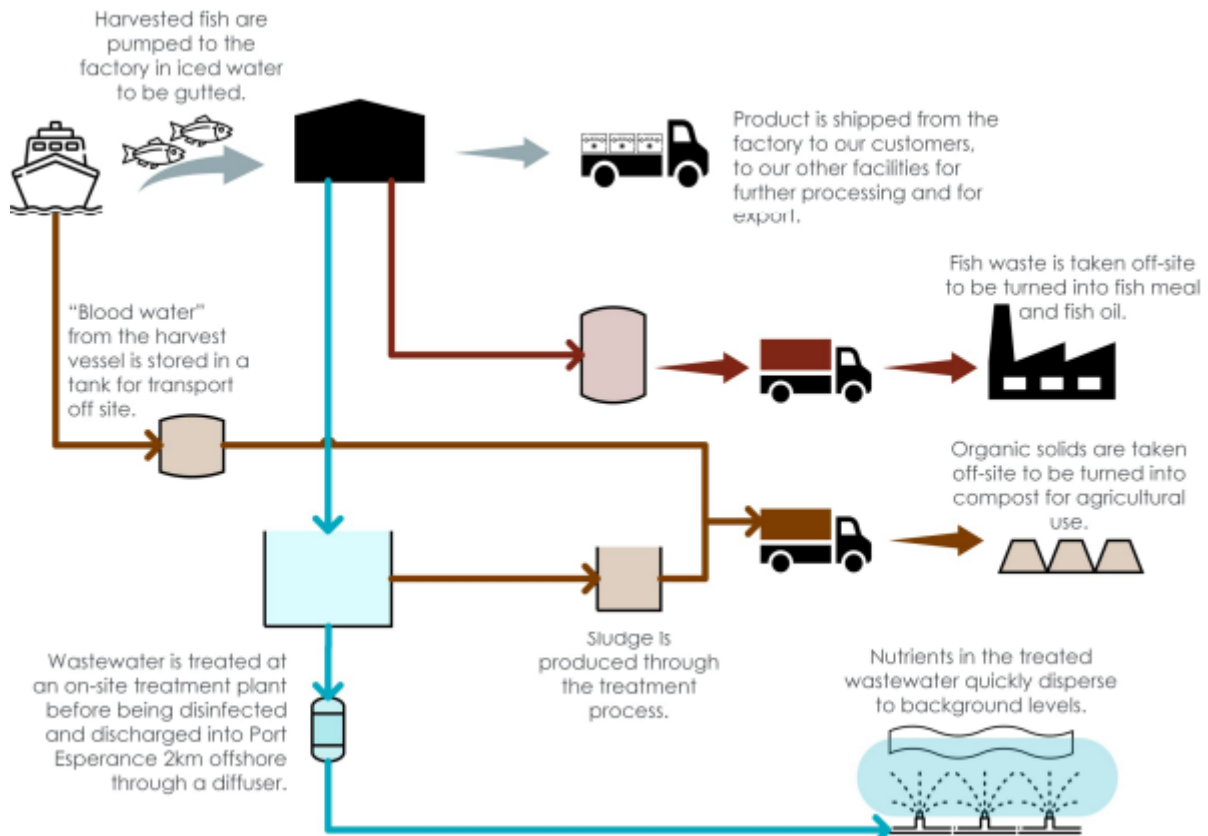


Figure 5: Key material flows through Dover factory (Figure 1 of the EIS).

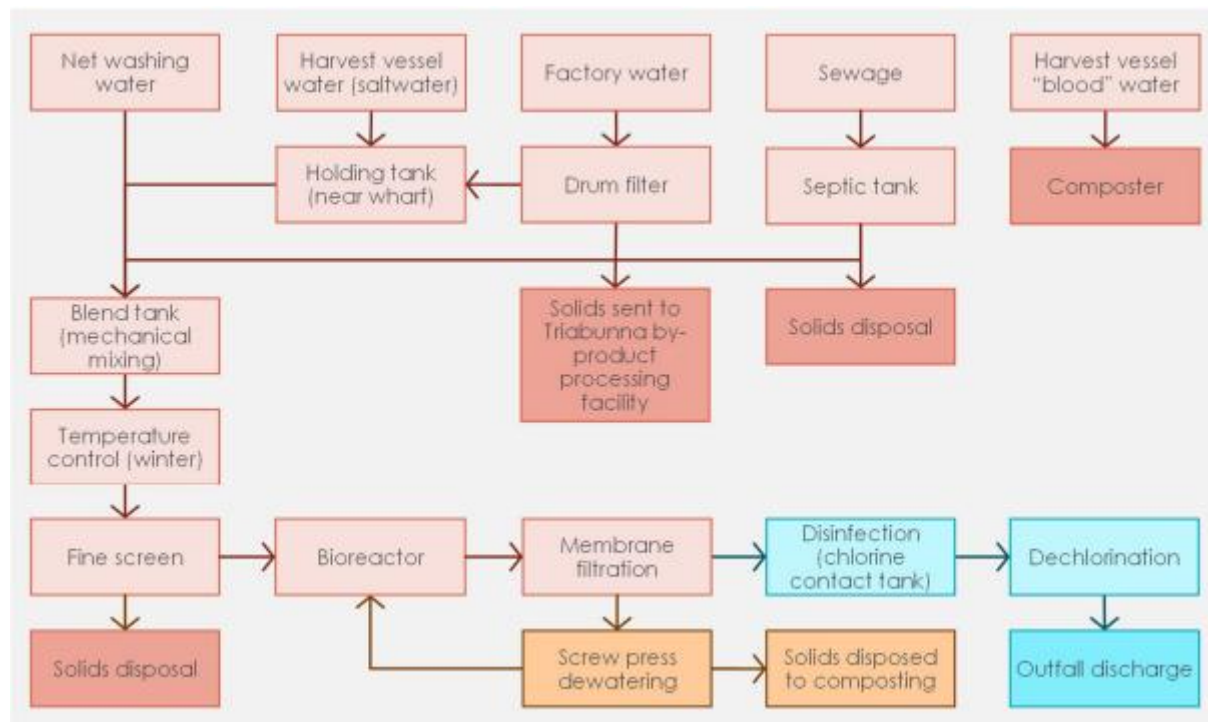


Figure 6: Proposed wastewater treatment process upgrades (Figure 21 of the EIS).

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### 3 Project Rationale and Alternatives

The site is currently operating as a fish processing factory and plans to increase production to 50,000 tonnes/year to meet productivity improvements and accommodate long-term growth to 2035. The proposed increase in production also provides flexibility to manage changes in daily and seasonal harvests. There are no proposed changes to marine farming activities. The increased production will result in increased fish by-products, organic solids and wastewater. The existing WWTP will be upgraded to include membrane filtration that will improve water quality discharged to Port Esperance.

Several WWTP options are considered in the EIS and have been assessed on performance, cost and constructability. These include:

- Do nothing resulting in a reduced quality of water discharged.
- Additional sequencing batch reactor (SBR) involving construction of additional dual-sided operating in parallel with the existing SBR; this approach carries a risk of occasional increased levels of solids in the discharge water.
- Continuous activated sludge (CAS) process involving converting the existing batch reactor suspended biological process into a continuous process. This approach results in improved settlement of solids but still carries a risk of occasional increased levels of solids in the discharge water.
- Membrane bioreactor (MBR) technology which is more robust to sudden changes in influent water quality due to filtration that provides a level of removal of nutrients and organic carbon regardless of biological processes. MBR is the preferred option based on performance and constructability.

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## 4 Public and Agency Consultation

46 public submissions were received during the public consultation period. The main issues raised were:

- Expansion of the salmon industry in the context of the recent government announcement halting any expansion until an independent review into the industry had been completed.
- Noise impacts from marine operations, increased vessel movements to supply the fish factory, increased truck movements.
- Impacts of increased effluent discharge.
- Biosecurity impacts of the proposal (concerns about fish mortalities).

During the assessment, the proposal was referred to several government agencies with an interest in the proposal. Aboriginal Heritage Tasmania, Department of Natural Resources and Environment Tasmania, provided comments. Biosecurity Tasmania provided advice relevant to the treatment of brine at Dover.

Appendix I of this report contains a summary of the public and government agency submissions received.

The Supplement to the EIS prepared by the proponent provides a response to relevant environmental issues raised during public consultation.

## 5 Evaluation of Key Environmental Issues

Potential water quality impact within Port Esperance, resulting from the proposed increase in fish processing, is considered the key environmental issue of the proposal.

### 5.1 Wastewater Quality

#### 5.1.1 Description

##### **Existing discharge and environment**

Tassal is permitted (PCE 7861) to undertake fish processing with 25,000 tonnes/year of product produced with effluent discharge of 490kL/day. Tassal currently produces (in accordance with temporary permission granted by the EPA) 34,000 tonnes fish product/year at the Dover fish factory with a treated wastewater discharge of 650kL/day into Port Esperance.

Wastewater treated by the WWTP is and will continue to be generated from:

- the harvest vessel (high salinity, high organic and nutrient loads from fish residue)
- vessel cleaning water (high salinity, sanitising agents, copper, zinc)
- factory processing water (freshwater high in organic, nutrient and oil/grease loads from fish residue; chromium, nickel)
- factory cleaning water (organic and nutrient loads)
- net washing (nutrient (esp. NO<sub>x</sub> and ammonia) loads from net cleaning, arsenic, copper)
- septic waste (organic and nutrient loads, copper).

Stormwater runoff, derived from the bin washing and chemical storage areas, and the fish waste storage area, is isolated from the stormwater network and also piped to the wastewater holding tank.

Tassal is also seeking approval to treat brine (high salinity water) from a potential RO system at the Triabunna rendering facility.

The EIS states the key water quality considerations for wastewater discharge include chemicals used in the factory and treatment process, and high levels of organic compounds and nutrients from fish waste.

The onsite WWTP currently provides tertiary treatment of wastewater, including removal of biodegradable organic matter, nutrients, and residual suspended solids, along with disinfection (Figure 6).

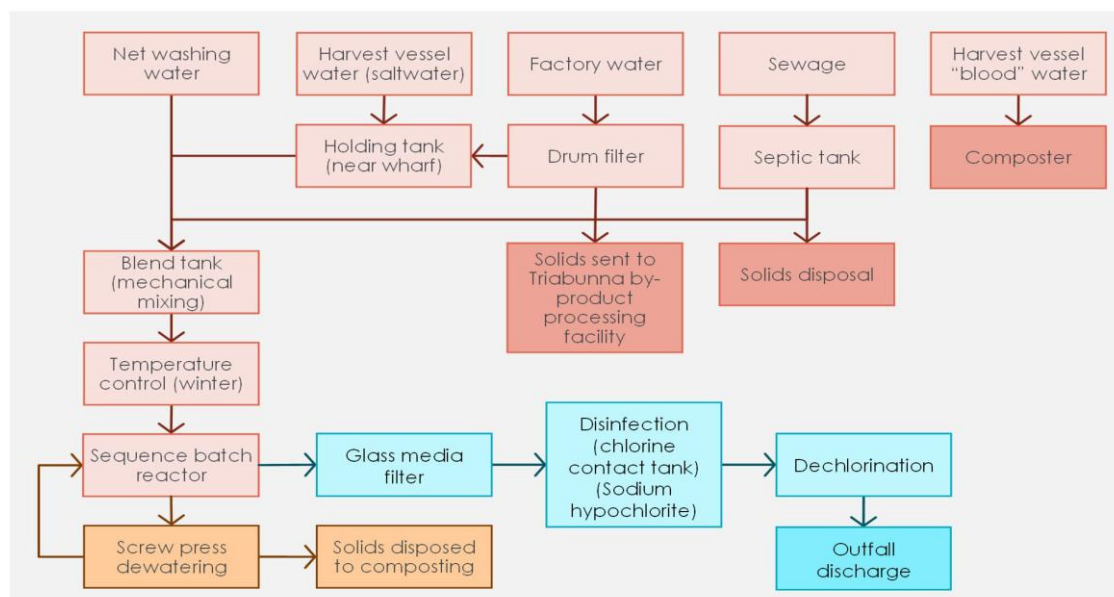


Figure 7: Existing wastewater treatment process (Figure I4 of the EIS).

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Wastewater from the factory is filtered before entering a holding tank near the wharf, along with water from the harvest vessel. Solids from the filter are sent to the Triabunna rendering facility. Wastewater from the holding tank and the net washing facility is pumped to a blend tank at the WWTP and then to the SBR where organic matter and nutrients are removed through a biological process. In winter, when the SBR temperature falls below 13°C, heated freshwater is added to raise the temperature to ensure sufficient biological activity.

Treated water is decanted from the SBR, filtered, and disinfected before being dechlorinated prior to discharge at the outfall. Solids from the SBR are dewatered using a screw press. The dewatered solids (waste activated sludge) are sent offsite to a composter and filtrate is returned to the SBR for treatment. Appendix J of the EIS, the WWTP Solids Management Plan (SMP), describes the generation, characterisation and management of WWTP solids; a monitoring program; and administrative arrangements to ensure compliance with regulatory requirements.

Following treatment, wastewater is discharged through a diffuser (replaced in 2022 as part of ongoing maintenance) at an outfall approximately 2.7 km from shore. No changes are proposed for the discharge pipeline and diffuser. Existing WWTP performance is shown at Table 1 (Section 2.1.2.4 of the EIS) and permitted effluent quality limits (PCE 7861 and subsequent EPNs) are at Table 2. Table 10 of the EIS shows the water quality results from the existing WWTP and highlights several non-compliances (including TSS, BOD, Ammonia as nitrogen, total nitrogen total chlorine) since 2018. Non-compliances are stated to be attributable to high loads in combination with cold weather and rainfall where the biological treatment was unable to sufficiently remove organic matter from the system. The number of non-compliances has reduced since 2018 with the implementation of upgrades, including a heating system delivering a maximum of 40kL of heated water per day to the SBR. The EIS Supplement provided additional data for 2023 -2025 showing non-compliances were confined to only TSS and BOD. An investigation by Tassal in 2025 indicated these exceedances were caused by sediment-laden stormwater entering the system.

**Table 1: Performance of the existing wastewater treatment process (Table 9 of the EIS).**

WATER QUALITY PARAMETER	PERFORMANCE
pH	pH has been gradually declining since 2018, with 50% of samples below the limit in 2020. Improvements to the dechlorination system have helped to keep pH levels compliant throughout 2021 and 2022.
TSS	There has been a reduction in TSS since 2018; nevertheless, in 2020 all criteria were exceeded. Monitoring results since the installation of the media filtration system show a significant improvement in TSS; with a single non-compliance in maximum TSS in March 2022.
BOD	There has been a reduction in BOD since 2018. In 2020, all criteria were exceeded. Monitoring results since the installation of the media filtration system indicate a significant improvement in BOD.
Ammonia	There has been a distinct reduction in ammonia levels since 2018, with monitoring results in 2019, 2020 and 2021 generally below permit limits.
Total nitrogen	There has been an overall reduction in total nitrogen levels since 2018. In 2020, median limits were met; however, maximum and 90 <sup>th</sup> percentile criteria were not met. Monitoring results since the installation of the media filtration system indicate an improvement in total nitrogen, with full compliance since October 2021.
Total phosphorus	Maximum and 90 <sup>th</sup> percentile criteria were met for total phosphorus since 2019; however, median levels were not met. Monitoring results since the installation of the media filtration system indicate an improvement in total phosphorus, with full compliance since October 2021.
Oil & grease	Oil and grease levels are generally very low, with a single exceedance of the upper limit since 2018.
Thermotolerant coliforms	Thermotolerant coliforms are well below permit limits. Tassal maintains coliform levels below 10 CFU/100 mL for biosecurity reasons.
Total chlorine residual	Chlorine residual levels are generally low, with five exceedances of the upper limit between 2018 and 2022.

**Table 2: Existing effluent water quality limits (Table 8 of the EIS)**

SUBSTANCE OR MEASURE	MEDIAN LIMIT	90 <sup>TH</sup> PERCENTILE LIMIT	MAXIMUM LIMIT
pH	—	—	6.5-8.5
TSS (mg/L)	10	20	30
BOD (mg/L)	10	15	20
Ammonia as nitrogen (mg/L)	5	10	12
Total nitrogen (mg/L)	15	20	30
Total phosphorus (mg/L)	1	3	5
Oil and grease (mg/L)	2	5	10
Thermotolerant coliforms (CFU/100 mL)	200	500	750
Total chlorine residual (mg/L)	—	—	1
Copper (µg/L)	—	—	—
Zinc (µg/L)	—	—	—

### Receiving Environment

The EIS states a clockwise circulation of water occurs around Port Esperance. High and moderate flow events in the Esperance River create stratified conditions in Port Esperance. Fresh river water mixes with the adjacent seawater, and often forms a brackish layer on the surface of the bay, overlying a net inflow of ocean water in the deeper channels. As discussed in Appendix I, these conditions result in containment of effluent, after high initial dilution, within the underlying saline waters.

Water quality shows significant seasonal variability with higher nutrient concentrations in spring through to summer as a result of marine inputs at this time of year. Water quality sampling taken near the

existing treated wastewater discharge point found there were no clear trends in physicochemical or nutrient concentrations with distance from the discharge point. Similar results were seen for sediment sampling (metals, total nitrogen and total organic carbon) near the existing treated wastewater discharge point. Changes in water quality are dominated by natural seasonal cycles.

Ecological surveys undertaken in 2021 found no handfish species, Tasmanian live-bearing sea-star (*Parvulastra vivipara*) or giant kelp forest. No evidence of Gun's Screw Shell was found during benthic biological surveys. Several marine pest species were recorded in the area.

Relevant Protected Environmental Values (PEV) established under the *State Policy on Water Quality Management 1997* for waters within the D'Entrecasteaux Channel (excluding marine reserves) are:

- A. Protection of aquatic ecosystems
  - (ii) Modified (not pristine) ecosystems
    - (a) From which edible fish, crustacea and shellfish are harvested
- B. Recreational water quality and aesthetics
  - (i) Primary contact water quality
  - (ii) Secondary contact water quality
  - (iii) Aesthetic water quality, and
- E. Industrial water supply (aquaculture).

Interim default guideline values (DGV) of water quality parameters under the State Policy for Tasmanian estuarine waters (including Port Esperance) are shown in Table 3.

**Table 3: Relevant full year interim DGV for Tasmanian estuarine waters (well flushed) (Table 43 of the EIS).**

WATER QUALITY PARAMETER	20 <sup>TH</sup> PERCENTILE	80 <sup>TH</sup> PERCENTILE
pH	7.4	7.9
Ammonia as nitrogen (mg/L)	-	0.029
Total nitrogen (mg/L)	-	0.384
Total phosphorus (mg/L)	-	0.0274

The EIS provides interim DGVs for the Bruny Bioregion but there are no nutrient limits for ammonia, total nitrogen or total phosphorus. Nor are there toxicant guideline values for chlorine in marine waters. The EIS adopted draft short-term guideline values from Batley and Simpson (2019) for 95% species protection of 0.0072 mg/L.

Hope Island is situated close to the WWTP discharge point and is listed in the EIS as a recreation area.

### **The proposal**

Tassal seeks to increase production at the Dover fish processing factory from the existing approved limit of 25,000 t/y to 50,000 t/y, noting that operation has been temporarily approved to 34,000 t/y, with an associated increase in treated wastewater discharge from the existing temporary limit of 650 kL/day to 720 kL/day. The proposed increased fish processing limit is anticipated to meet demand through to around 2035. Tassal is also proposing the on-site WWTP treat brine (maximum of 22kl/day) from a proposed RO system at the Triabunna fish rendering facility. According to the EIS, the brine will be very low in suspended solids and organic load but will include dissolved nutrients and high salinity.

Section 2.1.3 of the EIS states that to support the increased processing capacity, a major upgrade to the WWTP is proposed with the preferred treatment process being a MBR process. This would involve:

- increasing the volume of the anoxic section of the existing treatment tanks;
- operating the existing suspended biological treatment tanks continuously (rather than batch); and

- constructing a new membrane system to filter water before disinfection.

Construction for the proposed upgrade of the wastewater treatment plant would occur on the existing cleared WWTP site. It includes preparing level construction areas, using imported fill, and in-situ casting of reinforced concrete foundations. Pre-cast tanks or post-tensioned panels would be installed on the foundations along with the membrane filtration system (cassettes, piping and pumping systems). Electrical supply, piping and instrumentation would also be installed to integrate the membrane system into the overall treatment process.

The preferred MBR treatment process would use a combination of biological treatment for nutrient and organic carbon removal, and physical separation for additional nutrient and solids removal. The EIS (Table 18) states this treatment methodology is relatively robust to sudden changes in influent water quality, which can affect biological processes, as the filtration offers a level of removal of nutrients and organic carbon regardless of biological processes. The EIS also notes the MBR treatment technology addresses the current causes of non-compliance (i.e. high loads and low temperatures) through the provision of additional capacity and the ability to operate at high mixed-liquor suspended solids concentrations. The EIS states the proposed WWTP will continue to require wastewater temperatures to be maintained around 13°C to facilitate biological ammonia reduction.

The EIS (Section 2.1.3.2) sets out the results of modelling of the wastewater treatment process. Conservative model inputs were adopted for the concept design for the WWTP (i.e. maximum flow rates, high treatment loads and low temperatures). Modelling assumed winter temperatures of 12°C. The model is stated to represent a conservative estimate of performance, taking a high influent loading combined with a stringent discharge quality. According to the EIS there is a high level of confidence that the upgraded WWTP would meet the emissions limits for accepted modern technology for all parameters except total nitrogen. The removal of nitrogen relies on several biological treatment steps, which can be inhibited by the characteristic high salinity and low temperatures of the wastewater received at the WWTP. The predicted WWTP discharge water quality is presented in Table 4 below along with limits proposed by Tassal.

**Table 4: Proposed water quality limits for new WWTP compared with predicted WWTP discharge water quality (Table 14 of the EIS)**

Parameter	Tassal Proposed Limits			Predicted WWTP Discharge
	Median	90 <sup>th</sup> percentile	Maximum	
pH	-	-	<b>6.5-8.5</b>	6.92
Total Suspended Solids (mg/L)	10	20	<b>30</b>	<2
Biochemical Oxygen Demand (mg/L)	10	15	<b>20</b>	<1
Ammonia as nitrogen (mg/L)	1	2	<b>5</b>	<0.1
Total Nitrogen (mg/L)	15	20	<b>30</b>	6.1
Total Phosphorus (mg/L)	1	3	<b>5</b>	0.10
Oil and Grease (mg/L)	2	5	<b>10</b>	<2
Thermotolerant coliforms (CFU/100mL)	200	500	<b>750</b>	<10
Total Residual Chlorine (mg/L)	-	-	<b>1</b>	<1

### **RO Brine**

The upgraded WWTP is also proposed to treat a maximum of 22 kL/day of brine from a potential RO facility at the Triabunna fish rendering facility. The brine contaminant loads comprise ammonia (0.44 kg/day), TKN (0.44 kg/day), TN (0.45 kg/day), NO<sub>x</sub> (0.01 kg/day) and dissolved reactive phosphorus (0.07 kg/day) and total phosphorus (0.07 kg/day). Ammonia and DRP are the highest proportional

contaminant loads when compared to existing wastewater sources. Table 5 provides additional information on predicted water quality parameters for the RO brine.

**Table 5: Predicted water quality parameters for RO brine (Table 4 of the EIS)**

Parameter	Predicted Indicative Concentration	Parameter	Predicted Indicative Concentration
Conductivity	17.750 µS/cm	Ammonia	20 mg/L
pH	7.5	NOx	0.54 mg/L
Total dissolved solids	13.500 mg/L	Phosphate	3.5 mg/L

### **Potential impacts**

#### Construction

The EIS states construction may temporarily impact water quality and aquatic biota through increased sedimentation and release of contaminants from stormwater runoff, or leakage of hazardous substances from construction areas.

Interruptions to current treatment plant performance during construction and commissioning of the WWTP upgrades also have the potential to impact marine water quality. The EIS notes one of the more complex issues during commissioning is maintaining biological activity to ensure sufficient recovery to respond to treatment loads once reintroduced. However, the EIS states the proponent has extensive experience managing this aspect of the plant from both maintenance shutdowns and integration of new equipment and details specific commissioning steps to be completed prior to and including wet commissioning.

#### Operations

Operational discharge of wastewater from the WWTP into Port Esperance has potential to impact:

- Near field environment - before effluent receives sufficient dilution and dispersion, where contaminant toxicity to the marine ecosystem and pathogenic impacts to recreational users and aquaculture are the primary concern, and
- Far field environment - where increased nutrient loads, if excessive, can lead to eutrophication issues such as prolific algal growth and impact on aquatic communities by smothering substrates and causing deoxygenation.

Section 6.2.3 of the EIS provides the modelling results of dispersion from the diffuser. At peak discharge rates, a minimum 140 times initial dilution is predicted, with increased dilution at greater distances from the diffuser.

The EIS states the discharge of treated wastewater would not affect the PEV for waters within the D'Entrecasteaux Channel, as water quality would remain suitable for protection of aquatic ecosystems, recreation and aesthetics and water supply for aquaculture.

Cumulative impact of the proposal was considered in Section 6.15 of the EIS. Key nutrient input sources to Port Esperance include five marine farming leases, eight sewage treatment plants (Dover treatment plant discharges into Port Esperance), industrial discharges, rivers, and oceanic sources. The Dover fish processing factory is the only industrial plant that discharges into Port Esperance. The EIS states the nutrient load from the additional wastewater discharge is predicted to have a negligible effect on exceedance of DGV at MI2 (monitoring point closest to the discharge point). The Dover sewage treatment plant estimated annual nutrient loads into Port Esperance are 0.5-t/y ammonia, 0.5-t/y total nitrogen, <0.5t/y total phosphorus. The Dover fish factory discharges estimated annual nutrient loads into Port Esperance of 0.025t/y ammonia, 2.18t/y total nitrogen, 0.14t/y total phosphorus. Estimated nutrient contribution to Port Esperance from the Esperance River is 1-3t/y ammonia, 30-60t/y total nitrogen, 1-3t/y total phosphorus.

The EIS states the successful operation of the preferred WWTP technology relies on temperatures in the bioreactor being around or above 13°C. Subsequent advice from Tassal (email dated 12 September 2025) indicated that the preferred MBR technology is unlikely to require the addition of hot water but the capability to add up to 40kL hot water/day will be retained in the event the desired performance isn't achieved at ambient temperatures.

The EIS considers the potential impacts of an upset scenario (pp 122 of the EIS) which assumes flows are maintained with limited treatment through the plant and assumes average influent water quality. This option removes 50% of TSS and 30% of BOD and nutrients prior to discharge. BOD and TSS would be reduced to below background levels within 20m of the diffuser. Total phosphorus and total nitrogen would be reduced to below DGV and background levels within 20m of the diffuser. Ammonia concentrations would be significantly above DGV and background levels at 100m although below ANZG toxicity limits of 0.91mg/L. The EIS states such an event would be infrequent and short-term with discharges limited to a day or so.

The EIS concludes the upgraded WWTP will improve the quality of wastewater discharged into Port Esperance.

### 5.1.2 Management measures proposed in EIS

Management measures to address potential impacts associated with the upgrade of the WWTP are outlined in section 6.2.4 and 9 of the EIS and included below.

#### Construction and commissioning

ID	MANAGEMENT MEASURES	EIS SECTION
<b>Construction management</b>		
C.A	Develop a Construction Environmental Management Plan in accordance with Section 6.14.4, which addresses as a minimum: <ul style="list-style-type: none"> <li>• Site management</li> <li>• Erosion and sediment control</li> <li>• Dust management</li> <li>• Noise management</li> <li>• Waste management</li> <li>• Flora &amp; fauna management</li> <li>• Biosecurity requirements</li> </ul>	6.14.4
C.B	Develop a Commissioning Plan in accordance with Section 2.2, which addresses as a minimum: <ul style="list-style-type: none"> <li>• The planned commissioning process and staging, including hold points</li> <li>• Inspection and testing requirements</li> <li>• Checks to be conducted during commissioning</li> <li>• Investigation procedures and corrective actions for non-compliances during the commissioning process</li> <li>• Training and hand-over requirements</li> </ul>	2.2 0

The EIS also notes that any interruptions to current WWTP performance during construction and commissioning would be reduced by scheduling construction during periods of lower flow such as the annual factory shutdown (around 8 weeks) that occurs between February and April.

#### Operation

ID	MANAGEMENT MEASURES	EIS SECTION
<b>Water quality</b>		<b>6.2</b>
O.04	Water quality monitoring at the discharge point from the WWTP, and at the outfall discharge location in accordance with Permit conditions	
O.05	Operate the WWTP to comply with water quality discharge limits	

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### 5.1.3 Public and agency comment and responses

Twenty-one (21) public representations were made in relation to potential water quality impacts of the activity (see Summary of Representations at Appendix I). The representations were not always specific as to whether comments related to the land-based proposal (increased effluent discharge) or marine fish farming activities. Key issues raised in the representations were:

- Impacts on benthic layer, marine vegetation, algal blooms, water supply, shorelines, conservation areas, such as Hope Island, Port Esperance.
- Water quality data presented in the EIS was noted as not being recent.
- Query as to why the proposed effluent limits are similar to existing limits despite predicted improvements in performance of the wastewater treatment plant.
- A comparison was sought of the proposal with best practice wastewater treatment.
- Heavy metal pollution of Port Esperance was noted as a concern and one representor queried why nickels levels in sediment were elevated in Port Esperance. The residual toxicity of effluent was noted as a concern.
- Cumulative impact of all activities in Port Esperance.
- Call for an independent review of the modelling.

### 5.1.4 Evaluation

A key issue of concern for the proposal is the quality of the wastewater resulting from the proposed increase in fish processing. The existing WWTP has had prior exceedances of BOD, suspended solids, ammonia as nitrogen, total nitrogen, oil/grease, total chlorine residue, although there have been recent improvements following the addition of a media filtration system. However, supplementary data provided by Tassal for the past two years shows exceedances only in BOD and TSS, potentially due to sediment-laden contaminated stormwater.

In addition to full biological secondary treatment and disinfection, discharge via the diffuser into Port Esperance relies on dilution, to ensure no environmental harm; within 100 m of the diffuser, discharge is diluted within 240:1. Proposed upgrades to the WWTP are stated in the EIS to reduce BOD, TSS, TP, TN and ammonia to background levels within 20 m of the diffuser. According to modelling described in the EIS, the discharge of treated wastewater will not affect the Protected Environmental Values (PEV) for waters within the D'Entrecasteaux Channel, as the water quality would remain suitable for protection of aquatic ecosystems, recreation and aesthetics and water supply for aquaculture.

The MBR treatment process is stated in the EIS as the preferred technology with predicted water quality results that are significantly improved from current permitted median limits. The EIS Supplement notes that MBR technology has a higher pollutant uptake than conventional activated sludge process treatment and is used in locations such as North Queensland to meet strict water quality limits for the protection of the Great Barrier Reef. Given MBR is the preferred but not necessarily final technology, **CNI** requires the detail of the proposed upgrades, including how the outcomes specified in the EIS will be achieved, to be submitted to the Director prior to commencement of construction of the WWTP.

Construction of the WWTP upgrade may impact stormwater quality. The proponent commits to developing a Construction Environmental Management Plan. This is considered appropriate, particularly the inclusion of management measures that prevent impacts to surface waters and avoid elevated TSS levels in contaminated stormwater that reports to the WWTP. It is considered that it is not necessary to require the Plan through a condition as standard construction management measures should be sufficient.

Operation of the fish factory can also impact stormwater quality due to the washing of fish bins. For this reason, stormwater is segregated at the site to ensure only uncontaminated water is discharged to Port Esperance with contaminated stormwater reporting to the WWTP. Condition **E2** requires management of stormwater to prevent serious or material environmental harm. Condition **M4** requires stormwater from unsegregated areas to be monitored and adopts the same parameters and frequency as the existing permit.

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During commissioning of the upgraded WWTP, there is the potential for wastewater treatment to be interrupted and effluent to not be compliant with emission limits. The EIS states construction will occur during the annual factory shutdown to avoid reduced quality of wastewater discharge. The proponent commits to preparing a Commissioning Plan including investigation procedures and corrective actions for non-compliance with emission limits during commissioning. This is supported to ensure the commissioning process is as carefully considered and planned as possible, to avoid the discharge of poorer quality water, and to ensure EPA regulators are informed about the commissioning process. Condition **CMI** requires the Plan to be submitted to the Director prior to commencement of commissioning. Given the potential for the discharge of wastewater that is not compliant with emission limits condition **G8** requires the EPA Director to be notified of the date on which commissioning of the upgraded WWTP will be completed. Notification on completion of commissioning will also initiate the timeframe for introduction of effluent quality limits (See Condition E5 below).

**G12** restricts the proponent from increasing its production above 34,000 tonnes per year until the commissioning of the WWTP upgrade required by the permit conditions has been completed.

Until the new WWTP has been constructed and commissioned, interim effluent quality limits will apply. These limits are the same as those currently in place for the activity and will ensure that limits apply to discharged effluent until the WWTP upgrades have been constructed and commissioned. Condition **E4** applies and sets out the effluent quality limits for discharge leading up to the commissioning of the upgraded WWTP and for another 12 months post-commissioning.

Condition **M2** requires fortnightly effluent monitoring for the 12 months following completion of commissioning of the WWTP to confirm performance of the upgraded system, including over the winter months when water temperatures can influence WWTP performance. Under condition **M3**, effluent monitoring will then reduce to monthly (the existing monitoring frequency) 12 months after commissioning has been completed. Both permit conditions require that nitrite, nitrate and dissolved reactive phosphorus are included in the monitoring parameters; these are standard nutrient monitoring parameters that are included for treatment performance assessment.

Condition **E5** sets out effluent limits that will apply at the end of the 12-month period monitoring post-commissioning. The reduced limit proposed by the proponent for ammonia (maximum of 5 mg/L as opposed to the currently permitted limit of 12mg/L) is accepted, particularly given ammonia is an environmental toxicant to aquatic life. All other effluent limits proposed by Tassal are also accepted; these are consistent with the current permit. The assessment presented in the EIS is based upon compliance with these limits at the current production levels with BOD and TSS at background levels within 20m of the diffuser and showing no measurable effect on light transmission or dissolved oxygen. At the same distance from the diffuser, nutrients reduce to below DGV and background levels and chlorine concentrations are below draft guideline values. It is therefore predicted compliance with the proposed limits will result in no discernable impact to water quality within 20m of the diffuser and no measurable increase in nutrient loads within Port Esperance.

Condition **E6** requires the Director to be notified in the event emission limits are exceeded.

Condition **OP2** is an existing condition for the site included in PCE10627 in the event heating is required for the WWTP. The EIS states that wastewater temperatures will need to be maintained at around 13°C. Heating the wastewater in winter (using no more than 40kL of freshwater to prevent excessive dilution), when the temperature falls below 13°C, may be needed to promote sufficient biological activity in the WWTP and compliant effluent discharge.

Condition **MI** ensures samples and measurements are collected and analysed in accordance with appropriate procedures and standards to ensure the accuracy of results obtained, and that those results are provided in a monthly monitoring report to the Director. Condition **M5** requires the Director to be notified prior to a process shutdown during which time effluent monitoring is suspended.

The discharge location for effluent is specified in condition **E3**, with the location being as per the existing permit.

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### 5.1.5 Conditions

The proponent will be required to comply with the following conditions:

- G8** Notification of Completion of Commissioning
- G11** Annual Environmental Review
- G12** Temporary Production Increase
- CMI** Process Commissioning Plan
- CNI** Construction of Wastewater Treatment Plant Upgrades
- OP2** Use of the Wastewater Treatment Plant Heating System
- E1** Solid Matter in Wastewater
- E2** Stormwater
- E3** Effluent discharge locations
- E4** Interim effluent quality limits for discharge
- E5** Effluent quality limits for discharge
- E6** Exceedance of emission limits
- M1** Samples and measurements for monitoring purposes
- M2** Interim effluent monitoring
- M3** Effluent monitoring
- M4** Stormwater monitoring
- M5** Monitoring during process shutdowns

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## 6 Evaluation of Other Environmental Issues

In addition to the key issues, the following environmental issues are considered relevant to the proposal and have been evaluated in this section:

1. Air Quality
2. Groundwater
3. Noise Emissions
4. Solid and Controlled Waste Management
5. Biosecurity and Disease Management
6. Dangerous Goods and Environmentally Hazardous Materials
7. Biodiversity and Natural Values
8. Marine and Coastal
9. Greenhouse Gases and Ozone Depleting Substances
10. Socioeconomic
11. Decommissioning and Rehabilitation

### 6.1 General conditions

The following general conditions will be imposed on the activity:

- G1** Activity Area
- G2** Access to and awareness of conditions and associated documents
- G3** Incident response
- G4** Proposed change to activity
- G5** Change of responsibility
- G6** Change of ownership
- G7** Complaints register
- G8** Notification of completion of commissioning
- G9** Amendment of required plans and report
- G10** Annual Environmental Review
- G11** Temporary Production Increase

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## 6.2 Air Quality

### 6.2.1 Potential impacts

The air emission assessment in the EIS assessed potential odour sources related to wastewater management, being the holding tank near the wharf and the WWTP itself, and also considered the blood water storage tank and sludge storage. These waste products have the potential to produce odour as a result of decomposition, particularly if left for long periods or uncontained. The nearest sensitive receptors are located between 1.3km and 2.3km from the site. Dust generated during construction also has the potential to cause environmental nuisance, although less likely at sensitive receptors due to distance.

A screening air dispersion model (SCREEN3) was used to provide conservative odour ground level concentrations values from functioning of the proposed upgraded WWTP and byproduct storage, assuming maximum production levels. The model predicted, under normal conditions, odour ground level concentrations (glc) of 2.81 OU at the boundary of the facility (Table 41 of the EIS). This predicted result is above the Tasmanian *Environmental Protection Policy for Air Quality* criterion level (2 OU) at the boundary of the site. However, the model predicted glc, under normal conditions, would be below 1 OU at the nearest sensitive receptors.

### 6.2.2 Management measures proposed in EIS

The EIS states the proposed WWTP upgrade would use accepted modern technology for the treatment of wastewater. When maintained and run effectively, the risk of odour impact from the proposal is considered by the proponent to be low. According to the EIS, upgrades allow for redundancy in the system, with maintenance able to be scheduled during low production periods, while allowing for the continued treatment of low wastewater flows. Personnel training and retention of spares for critical equipment are stated to be essential to minimising the risk of the treatment process failing and high odour levels being generated.

The Tassal WWTP Solids Management Plan outlines storage of solids in a covered 15m<sup>3</sup> skip bin that is removed weekly (or as required) by a registered controlled waste operator. The Plan also states that, if required, lime will be applied to the solids to reduce odour.

The EIS further states that fish waste would be removed from site daily.

The following management measures are listed in Tables 68 and 69 of the EIS:

<b>Air quality (Construction)</b>	
C.01	Avoid the use of long-term stockpiles onsite
C.02	Stabilise access to the site to minimise dust entrainment from vehicles
C.03	Properly maintain all equipment used on site to minimise exhaust emissions

<b>Air quality (Operation)</b>	
O.01	Properly maintain all equipment to minimise exhaust emissions
O.02	Manage WWTP solids in accordance with the WWTP Solids Management Plan to minimise odours
O.03	Investigate the cause of any odour complaint and implement mitigation/attenuation as required

### 6.2.3 Public and agency comment

Five (5) public representations were made in relation to air quality impacts of the activity (see Summary of Representations at Appendix I). The key issue raised was dust generated by increased traffic. One representation noted concerns about odour.

### 6.2.4 Evaluation

The Dover facility is well separated from nearby receptors with these located at a distance between 1.3 and 2.3km. Under normal operating conditions, according to the air emissions screening modelling presented in the EIS, it is unlikely that odour from a well maintained and operated WWTP will cause a nuisance at the nearest sensitive receptors. Odour emissions at the boundary will be higher than Tasmanian *Environmental Protection Policy for Air Quality* criterion level (2 OU) at the boundary of site but

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it is noted the surrounding land is owned by Forestry Tasmania (zoned Rural Resource) and therefore slightly elevated odour levels are unlikely to cause a nuisance.

The EIS notes that under an upset scenario, such as could occur during maintenance or due to heavily loaded systems, modelling shows there is the potential for odour nuisance (a potential boundary outcome of 10.61 OU and a potential adverse impact (2 OU) at nearest sensitive receptor locations). The upset modelling is stated to be very conservative and determined under stable atmospheric conditions and low wind speed. Any odour is likely to be mitigated by meteorological conditions and topography.

Odour management measures necessary to prevent odours causing environmental nuisance beyond the boundary of the Activity Area will be required by condition **A1**. A complaints register will be required by condition **G7**.

It is noted the air emissions modelling conducted for the EIS did not include the increase in fish waste (described as fish by-product by Tassal) associated with the proposed increase in production. According to the EIS, fish waste generated by the factory is held in bins and retained in a dedicated chiller prior to being transported daily to the Triabunna plant for further processing. Generation of odour from fish waste is considered unlikely given the short retention time in a temperature-controlled environment minimising the potential for biological breakdown. While there is the potential for fish waste to contribute to odour emissions, appropriate storage and management of fish waste will mitigate against this potential risk. Condition **WM2** will require the ongoing storage of fish waste in leak-proof, lidded containers that must be moved to a refrigerated area within 8 hours from generation of the waste with fish waste to be removed from the Activity Area within 24 hours of generation. Condition **WM3** requires the management of wastewater solids in accordance with the WWTP SMP, with that plan stating solids will be stored in a covered 15m<sup>3</sup> skip bin collected every 5 days or as required.

Dust emissions within the Activity Area are not expected to be a source of nuisance given the scale and nature of construction activities, and distance to receptors.

### 6.2.5 Conditions

The proponent will be required to comply with the following conditions:

- G7** Complaints Register
- A1** Odour management
- WM2** Fish Waste Management
- WM3** Wastewater Treatment Plant Solids Management

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## 6.3 Groundwater

### 6.3.1 Potential impacts

The EIS states groundwater at the site is likely to be present as a shallow local aquifer in weathered dolerite, with groundwater standing levels between 5 and 10 m below ground level (BGL), and a deeper regional aquifer, possibly confined, within fractured dolerite at least 50 m BGL. Groundwater is noted to discharge immediately from the site to the marine environment.

The EIS (Section 6.3) concludes groundwater is not expected to be intercepted, used, or adversely affected by the proposed development. The proposal does not include any extraction of groundwater. All storage of chemicals, wastewater and solid wastes is stated to be on sealed hardstand areas, or within self-bunded containers; consequently, no impacts to groundwater are anticipated.

### 6.3.2 Management measures proposed in EIS

Tassal's existing groundwater quality monitoring program was proposed to be continued only until the end of 2025 given the removal of sludge lagoons.

Chemicals and liquids used during construction and operation are proposed to be contained and managed to prevent release to groundwater. Procedures exist to minimise the likelihood of spills or leaks reaching the environment and to provide rapid spill response.

The following management measures are listed in Tables 68 and 69 of the EIS:

<b>Dangerous goods and environmentally hazardous materials (Construction and Operation)</b>	
C.08	Store, handle, transport and dispose of all chemicals & DGHS in accordance with established procedures
C.09	Follow established spill & emergency response procedures in the event of a spill or leak

<b>Groundwater (Operation)</b>	
O.06	Continue the existing annual groundwater quality monitoring regime until 2025

### 6.3.3 Public and agency comment

No representations were received related to groundwater.

### 6.3.4 Evaluation

Historically, Tassal managed sludge from the WWTP by decanting it into wastewater lagoons for dewatering and transportation off-site. The management of sludge changed in 2016 and the lagoons were decommissioned the following year with sludge removed in 2022. Tassal's groundwater monitoring program was implemented to monitor the impact of wastewater lagoons that have since been removed. The groundwater monitoring program was scheduled to end in 2025.

The proposed intensification and upgrade of the WWTP (which is contained) is unlikely to result in infiltration to groundwater. There is no requirement for groundwater monitoring to be conducted in relation to the proposed intensification and WWTP upgrade.

Appropriate storage and use of solid and hazardous waste on hardstand areas will mitigate potential risks to groundwater. Condition **H1** requires that environmentally hazardous materials must be stored within bunded containment areas, spill trays or containment systems. Condition **H2** requires spill kits to be available on site.

### 6.3.5 Conditions

The proponent will be required to comply with the following conditions:

- H1** Storage and Handling of Hazardous Materials
- H2** Spill kits

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## 6.4 Noise Emissions

### 6.4.1 Potential impacts

The EIS states noise-generating activities are likely during the construction phase of the WWTP and also as a result of increased traffic movements on Narrows Road from intensified operations. The nearest sensitive receptor (CT 135135/1, Narrows Road) is 1.3km west of the WWTP and separated by a north-south aligned ridgeline. The Hope Island recreation area is within 2km of the Dover facility. The EIS states there are two small clusters of residential dwellings located close to Narrows Road.

Sources of construction noise include plant and equipment during earthworks and structural construction. All construction activities will occur during daytime hours and no high-noise activities such as pile-drilling or blasting are proposed. The EIS concludes no noise impacts are anticipated from construction activities.

Marine vessel movements (associated with delivering fish to the factory) will not increase but instead each vessel will deliver increased fish tonnage. It is noted that, other than fish unloading activities at the factory wharf, noise generated by marine vessels is not considered in this assessment as this is managed through the relevant Environmental Licence(s) for the marine-based aquaculture. Similarly, traffic movements associated with Tassal's Hawkers Point marine operations facility and net wash facility – both located west of the fish processing factory on Narrows Road – are not included in this assessment.

Traffic movements at the fish processing factory will increase primarily due to the addition of a processing shift and a consequent increase in light vehicle movements. According to the EIS Traffic Impact Assessment, the timing of light vehicle movements will change with peak light traffic movements occurring between 8:30am and 9:30am. There will therefore be an increase in the regularity of traffic-generated noise but peak noise levels will remain the same.

The proposed increase in heavy vehicle movements (an additional four trips per day (8 movements)) has a greater potential than light vehicles to cause nuisance in surrounding areas given engine and exhaust noise. Based on further information provided by Tassal, the proposed additional heavy vehicle movements will occur between 6:00am and 2:00pm with one additional truck movement to the site occurring during the night-time period (between 6:00am and 7:00am).

There are several dwellings in the vicinity of the site that could be affected by the increase in heavy vehicle movements particularly during night-time hours. Noise generated by heavy vehicles along Narrows Road was raised during the advertising period with a concern that heavy vehicles were operating during the night and any increase in traffic movements would have a negative impact. Information provided in the EIS Supplement assessed traffic noise impacts against criteria provided in the *NSW Road Traffic Policy (2011)* and criteria in the *Tasmanian Environment Protection Policy (Noise) 2009*. The NSW policy sets criteria for existing residences affected by additional traffic on existing local roads generated by land use developments: day-time 55dB(A), night-time 50dB(A) and an increase of no more than 2dB(A) above existing levels. This differs from the Tasmanian noise policy in that it applies to traffic noise but the Tasmanian noise policy is also highly relevant as it offers an indication of an acceptable sleep disturbance criterion (60dB(A)). The EPA's noise specialist agreed these criteria were relevant to the assessment.

The assessment found that houses along Narrows Road and Tylers Road were likely already subject to noise levels in excess of the NSW criteria with current levels of production at the fish factory. With the intensification of the fish factory and the management measure of reduced traffic speeds (40km/hr) between dusk and dawn along Narrows Road, the Supplement stated that the houses at distances of 27m or greater from the road would be compliant with the NSW criteria whereas the houses in very close proximity to the road (6m), would have improved night-time noise levels but an increase of 2dB(A) during the day-time. This meets the NSW criteria of no more than 2dB(A) above existing levels.

According to the EIS, there will be no additional operational noise due to the factory intensification other than an increase in traffic-related noise which is forecast to increase by 22%.

The EIS (Appendix F) states operational traffic will increase by 22% due to an extra processing shift and a slight increase in heavy vehicle movements. Peak traffic volumes will coincide with the start and end

of processing shifts at 11pm, 9am and 7pm. The development is stated to have the potential to increase the number of light vehicle trips from 38 to 62 in any one-hour period, with this one hour period (busiest hour) likely to be 8:30 to 9:30am. Previous peak volumes for processing shift changes occurred at 5am and 3pm (40 staff for both). Section 6.16 of the EIS states the increase in vehicle movements is not expected to cause noise nuisance for residents along Narrow Road.

#### 6.4.2 Management measures proposed in EIS

Construction work will be undertaken in accordance with the *Draft Construction Noise Guidelines* (NSW EPA, 2020).

The following management measures are listed in Tables 68 and 69 of the EIS:

<b>Noise (Construction)</b>	
C.05	Limit construction hours to Monday to Friday from 7 a.m. to 6 p.m. & Saturday from 8 a.m. to 1 p.m.
C.06	Properly maintain plant & equipment to minimise noise emissions
<b>Noise (Operations)</b>	
O.07	Investigate the cause of any noise complaint & implement mitigation/attenuation as required
<b>Flora and fauna</b>	
O.13	To reduce risks of roadkill incidents: <ul style="list-style-type: none"> <li>• Limit speeds of Tassal vehicles on Narrows Road between dusk and dawn to 40 km/h</li> </ul>

#### 6.4.3 Public and agency comment

Twenty-seven (27) public representations were made in relation to noise impacts of the activity (see Summary of Representations at Appendix 1). Most of the representations were from individuals located in suburbs some distance from the fish factory. Some representations were not specific as to whether the source of noise was terrestrial or marine. Key issues raised in the representations were:

- Impacts from marine operations generally.
- Increased truck movements (and engine brake noise).
- Pumping station operation (from the freshwater supply system that is not a regulated premises).
- Several representations raised the cumulative impact of noise from all listed sources.
- Some representations mentioned heavy vehicle vibration as a source of nuisance.

#### 6.4.4 Evaluation

Proposed construction does not involve plant or equipment with the potential to generate high levels of noise. The distance and topographical separation from nearest receptors further reduce the risk that construction activities will cause nuisance.

Operation of the fish processing factory and WWTP is unlikely to change significantly with the increased production levels; noise emissions will therefore be largely unchanged. The surrounding topography, with a 100-120m high (north-south) ridgeline, further mitigates the potential for any noise emissions from the Activity Area to impact on surrounding receptors. For these reasons, noise is not regarded to be a key issue for operational activities conducted within the Activity Area and noise modelling was not required for the assessment. The EPA has received no noise complaints related to the existing operation and conditions are not considered necessary to address factory and WWTP generated noise.

The results of the supplementary noise assessment showed that existing traffic operations would exceed selected criteria at those houses located in close proximity (<27m) to roads such as Narrows Road. Tassal advised during the assessment the detail of existing vehicle trips provided in the Traffic Impact Assessment was not accurate, overlooking heavy vehicle movements during the night from Tassal's Eastern Zone to Dover. However, it is noted that the proposal will only result in a single additional truck movement to the site during the night-time period between 6:00am and 7:00am. The EPA requested additional advice on whether this changed the results of the supplementary noise assessment; that advice showed the findings of the noise assessment remained very similar to the previous version of the assessment with the increase from existing to future scenarios being no greater than 2dB. Tassal's

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advice acknowledged the frequency of maximum events is higher than previously assessed due to vehicle movements being spread through a greater proportion of the night period. Tassal also noted the site's long operating history and lack of complaints.

Given the potential for nuisance to occur particularly from heavy vehicle movements at night, and the inability of the EPA to enforce Tassal's proposed speed limits on vehicles, condition **N1** requires any noise complaints to be reported to the Director within 24 hours and condition **G7** requires the proponent to record any investigations undertaken in relation to the complaint and the manner in which the complaint was resolved. This is consistent with the proponent's commitment to investigate any noise complaints.

Condition **N2** requires, if directed by the Director, a post-approval noise survey to be conducted within six months of any changes to the activity and where otherwise directed. Condition **N3** sets out the noise survey methodology required.

The proponent's proposal to investigate noise emissions from the pumping station on Narrows Road is supported along with any subsequent mitigation of noise.

#### 6.4.5 Conditions

The proponent will be required to comply with the following conditions:

- N1** Noise complaints
- N2** Noise survey requirements
- N3** Noise survey method and reporting requirements
- G7** Complaints register

### 6.5 Solid and Controlled Waste Management

#### 6.5.1 Potential impacts

The EIS states waste generated from intensification of the fish processing factory will largely include an increase in organic solids (WWTP sludge), and fish-derived controlled waste (referred to as 'by-products'). These wastes have the potential to cause environmental nuisance or harm through pollution and generation of odour. Odour emissions associated with waste generated by the processing facility have been addressed under Section 5.2 Air Emissions.

The proponent has an existing WWTP Solids Waste Management Plan as required by the activity's existing environmental conditions. The Plan is restricted to management of WWTP sludge and an updated version has been included in the EIS. The updated Plan reflects the change in management of sludge that occurred in 2016 with sludge no longer decanted into wastewater ponds or lagoons for dewatering and transportation off-site. The lagoons were decommissioned in 2017, sludge removed in 2022, and the upper lagoon levelled. According to Figure 23 in the EIS, the lower lagoon site will be occupied by the new flow balance tank and fire water tank.

#### WWTP Solids (Sludge)

Waste sludge resulting from the wastewater treatment process is dewatered using a screw press to produce solids suitable for beneficial use. The solids are discharged to covered storage bins before weekly removal by a registered controlled waste contractor to an authorised commercial composting facility for subsequent agricultural use. The EIS states approximately 10-15 tonnes of solids are currently produced each week. Appendix J of the EIS (WWTP Solids Management Plan) states that with the proposed intensification, the volume of solids is expected to increase to 15-20 tonnes per week with collection increased to every 5 days or as required.

Solids produced by the WWTP were analysed and assessed against the Tasmanian Biosolids Reuse Guidelines (TBRG) 2020 to confirm suitability for reuse as compost. The EIS (WWTP Solids Management Plan, Appendix J) contains the results of annual sampling of the solids showing all analytes

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are below 50 % of the TBRG Contaminant Acceptance Concentration Threshold for Contaminant Grade B.

### Blood Water

Section 2.1.2.4 (Table 2 of the EIS) sets out wastewater sources with these including 50kL/day of blood water. The EIS notes blood water, a mixture of seawater and fish blood from the harvest vessels, is stored on-site in two storage tanks with a combined capacity of 4,000L. The tanks are emptied using vacuum trucks up to three times per week with the blood water transported to an authorised commercial composting facility using a controlled waste contractor. The tanks are located on a bunded concrete slab with a bund capacity of 7,000L. The EIS states the management of blood water would remain essentially the same with the proposed intensification, other than larger volume vacuum trucks being required to transport the blood water from site.

### Fish Waste

According to the EIS, fish waste is currently 3,112 tonnes/year (as at 2021) and will increase by 1,530 tonnes/year following intensification. Fish waste is stored in bins in a dedicated operational chiller and collected daily for transport to the Tassal Triabunna rendering facility. Tassal has stated the rendering facility has sufficient capacity to receive the waste but if the Triabunna facility was unable to temporarily receive the fish waste, the waste would be disposed to landfill.

## 6.5.2 Management measures proposed in EIS

According to the EIS, existing waste management storage and collection procedures will be maintained with increased storage capacity or collection frequency as required to match generation rates.

Annual solids monitoring will also be undertaken to ensure that the beneficial reuse of the WWTP solids continues to be conducted without risk to the receiving environment (WWTP Solids Management Plan).

The following commitments are listed in Tables 68 and 69 of the EIS:

Waste management (Construction)	
C.07	Store all waste materials generated by the construction activities in appropriate containers & remove from site, either for disposal at an appropriately authorised facility or to be transported directly to an authorised recycler/re-user

Waste management (Operations)	
O.A	Maintain & update the WWTP Solids Management Plan on an annual basis
O.08	Manage all fish by-products following established biosecurity procedures
O.09	Sort, store & transport wastes in appropriate containers & in a way that minimises waste sent to landfill

## 6.5.3 Public and agency comment

Three (3) public representations were made in relation to waste management (see Summary of Representations at Appendix I). Key issues raised in the representations were:

- Blood water waste management (including storage).
- General waste management and disposal including where waste was disposed and whether these disposal locations had the ability to accommodate additional material.
- Waste from marine activities.
- Transport of contaminated waste.

## 6.5.4 Evaluation

Waste management processes are well established at the Dover facility and are supported. The capacity of existing waste facilities to receive additional waste from the Dover facility is noted along with contingency measures in the event waste was unable to be received.

The existing containment of bloodwater is considered appropriate to prevent any discharge to the environment. As per current practice, condition **WMI** requires that blood water be stored in the

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Activity Area for no longer than five days, except when used to support biological functions within the WWTP during process shutdowns.

As outlined in Section 7.2 Air Emissions, fish waste management practices are prescribed in Condition **WM2**.

The estimated 15-20 tonnes of WWTP sludge that will be produced per week will require an increased frequency of collection and removal to a composting facility for subsequent agricultural use. Condition **WM3** requires the proponent to operate in accordance with the Wastewater Treatment Plant Solids Management Plan (dated October 2023 or as updated) that specifies solids are to be stored in covered skip bins and removed every five days or as required. Annual solids monitoring will also continue under the WWTP Solids Management Plan.

### 6.5.5 Conditions

The proponent will be required to comply with the following conditions:

**WM1** Receiving of Blood Water

**WM2** Fish Waste Management

**WM3** Wastewater Treatment Plant Solids Management Plan

## 6.6 Biosecurity Management

### 6.6.1 Potential impacts

The movement of salmon product, by-products, and fish waste has the potential to transfer endemic pathogens between different regions of Tasmania.

The EIS (Section 2.1.2.7) notes that current management involves removing fish waste from the fish processing area in marked containers to prevent cross contamination, and regular cleaning of floor areas and under processing machinery to ensure no accumulation of solids. Drains in the factory floor are used to collect wash water and fish by-products. This waste stream is filtered to remove solids and wastewater is transferred to a tank prior to treatment.

Dedicated bins are used to store and transport by-product to the Triabunna rendering facility. All containers with by-product are placed in specific containment areas and held in a dedicated operational chiller prior to transport. By-product bins and lids are cleaned and sanitised after use before being returned to the production area. External containment areas and associated drains are kept free of solid fish remnants and cleaned and sanitised daily using appropriate cleaning materials.

According to the EIS, Tassal disinfects wastewater using chlorine to a level lower than current permit conditions. Disinfection is achieved by meeting standard conditions (<10CFU/100mL thermotolerant coliforms, an indicator of bacterial loads) consistent with those approved by the Chief Veterinary Officer of NRE Tasmania for the disinfection of wastewater. This level is lower than the Permit conditions (PCE 7861) of 750 CFU/mL (maximum limit).

### 6.6.2 Management measures proposed in EIS

The following commitments are listed in Tables 68 and 69 of the EIS:

<b>Construction management</b>	
C.A	Develop a Construction Environmental Management Plan in accordance with Section 6.14.4, which addresses as a minimum: <ul style="list-style-type: none"><li>• Site management</li><li>• Erosion and sediment control</li><li>• Dust management</li><li>• Noise management</li><li>• Waste management</li><li>• Flora &amp; fauna management</li><li>• Biosecurity requirements</li></ul>

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## Waste management (Operations)

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O.08 Manage all fish by-products following established biosecurity procedures

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### 6.6.3 Public and agency comment

Six (6) public representations were made in relation to biosecurity (see Summary of Representations at Appendix I). Several of the representations related to marine fish farming activities. Key issues raised in the representations were:

- Bloodwater management
- Alternative disinfection options
- Query about monitoring thermotolerant coliforms.
- Processing of diseased fish
- Bacterial outbreaks, antibiotic usage and fish mortalities.

Biosecurity Tasmania provided advice on those matters regulated under biosecurity legislation with specific reference to Processing Operations Standards contained in *Biosecurity Program, Tasmanian Salmonid Industry*, Biosecurity Tasmania, 2023.

### 6.6.4 Evaluation

The proponent's stated ability to meet disinfection standard conditions approved by the Chief Veterinary Officer of NRE Tasmania for the disinfection of wastewater is reflected in effluent quality limits for discharge specified in condition **EF5**.

Tassal's existing permit (9635/5) requires the site to operate in accordance with an approved Disinfection Plan that selects chlorination as the preferred treatment of WWTP effluent; this is replicated in condition **OPI**.

### 6.6.5 Conditions

The proponent will be required to comply with the following conditions:

**EF5** Effluent quality limits for discharge to water

**OPI** Disinfection Plan

## 6.7 Dangerous Goods and Environmentally Hazardous Materials

### 6.7.1 Potential impacts

The EIS states chemicals used during construction of the WWTP could include items such as fuel and small amounts of adhesives, lubricants, and cleaning agents.

Section 6.6 of the EIS lists the chemicals required for operation of the upgraded WWTP: sodium bisulfite, sodium hydroxide, sodium hypochlorite. The volumes of these chemicals are stated to remain unchanged for the upgraded WWTP (using preferred MBR technology). Table 5I of the EIS lists LPG as a chemical used in the current WWTP to fuel gas heaters that are used maintain influent temperatures to the WWTP in winter.

The proposed increase in fish processing will require additional volumes of chemicals in operating the facility. Table 5I of the EIS lists the volumes of chemicals currently used in the fish factory including several dangerous goods: fuels (10,000L petrol and 4,000L diesel), LPG (2,930L), corrosive substances (approx. 10,000L), and flammable chemicals (1,200L). The EIS states there may be some minor increases in chemicals required for fish processing. The proponent states that increased volumes of dangerous goods and hazardous substances will be managed initially through increased delivery rates with the potential for additional minor storage areas to be developed over time.

Chemicals and fuels used on site pose a risk to the environment if they are not adequately contained and appropriately disposed of. They may cause harm to flora and fauna, particularly in aquatic environments.

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### 6.7.2 Management measures proposed in EIS

The EIS states all chemicals would be stored within suitable, bunded containers. Construction impacts will be managed through compliance with the Construction EMP and chemical handling and spill response procedures.

The following management measures are listed in Tables 68 and 69 of the EIS:

<b>Dangerous goods and environmentally hazardous materials</b>	
C.08	Store, handle, transport and dispose of all chemicals & DGHS in accordance with established procedures (Section
C.09	Follow established spill & emergency response procedures in the event of a spill or leak
<b>Dangerous goods and environmentally hazardous materials</b>	
O.C	Maintain and update existing factory management plans on a regular basis, including: <ul style="list-style-type: none"><li>• PRO-171 Emergency Procedures – Dover Wet Processing</li><li>• PRO-175 Waste Management &amp; Disposal at Processing Sites</li><li>• WHS-110 Dangerous Goods and Hazardous Substances</li></ul>
O.10	Store, handle, transport & dispose of all chemicals & DGHS in accordance with established procedures
O.11	Follow established spill & emergency response procedures in the event of a spill or leak

The EIS notes Tassal has a Dangerous Goods and Hazardous Substances management plan integrated into the site's systems and procedures.

### 6.7.3 Public and agency comment

Two (2) representations raised concerns about the transport of hazardous waste.

### 6.7.4 Evaluation

The volume of dangerous goods used in the operation of the upgraded WWTP and fish processing is stated to increase over time. This is proposed to be managed initially through increased frequency of deliveries and subsequent provision of additional minor storage located in sealed areas and with bunding. The appropriate storage and management of dangerous goods and environmentally hazardous materials, as outlined in the commitments above, is supported. Condition **H2** requires that all environmentally hazardous materials held in the Activity Area be stored within maintained and functional impervious bunded areas, spill trays or other containment systems and managed to prevent unauthorized discharge. The provision of spill kits on site is required by Condition **H1**.

### 6.7.5 Conditions

The proponent will be required to comply with the following conditions:

- H1 Spill kits
- H2 Storage and handling of hazardous materials

## 6.8 Biodiversity and Natural Values

### 6.8.1 Potential impacts

Section 6.7 of the EIS focuses on terrestrial biodiversity and natural values. Section 6.8 of the EIS addresses the marine environment and species (see Section 6.1.35 below). The EIS notes the proposed WWTP upgrades are located within an existing cleared area. Construction will not impact on remnant vegetation communities or suitable habitat for rare or threatened species. Bushfire management will require vegetation to be modified and maintained in a low fuel state to protect buildings. The EIS notes

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the WWTP site is free of environmental and declared weeds but also notes the potential for weeds to be introduced to the site during construction.

The estimated increase in night-time light traffic movements (associated with an additional fish processing shift) has the potential to affect threatened fauna species including the Tasmanian devil, eastern quoll, and eastern barred bandicoot. The EIS estimates that peak traffic volumes would coincide with the start and end of shifts, notably 11pm (40 staff arriving), 9am (40 staff leaving and 24 staff arriving) and 7pm (24 staff leaving). Previous peak volumes for processing shift changes occurred at 5am and 3pm (40 staff for both). The increase in night-time traffic movements is less than 10% of the existing night traffic movements.

### 6.8.2 Management measures proposed in EIS

Section 9 of the EIS details measures to manage weed impacts and to reduce roadkill incidents.

The following management measures are listed in Tables 68 and 69 of the EIS:

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<b>Flora and fauna (Construction)</b>	
C.10	Implement a weed hygiene plan, which addresses minimum requirements including: <ul style="list-style-type: none"><li>• A washdown history for all machinery used for earthworks</li><li>• Inspection &amp; cleaning protocols for vehicles &amp; equipment that has been transferred from another site</li><li>• Inspections &amp; cleaning protocols for vehicles &amp; equipment before leaving the site</li><li>• Inspection &amp; monitoring requirements to detect weed infestation</li></ul>

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<b>Flora and fauna (Operation)</b>	
O.12	Continue existing annual weed control program
O.13	To reduce risks of roadkill incidents: <ul style="list-style-type: none"><li>• Limit speeds of Tassal vehicles on Narrows Road between dusk and dawn to 40 km/h</li><li>• Install signage warning of wildlife on the road after dusk</li><li>• Regularly inspect the road and remove dead wildlife if safe to do so, and</li><li>• Record roadkill deaths, and report deaths of Tasmanian devils, quolls, or eastern barred bandicoots to DNRET.</li></ul>

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### 6.8.3 Public and agency comment

Twelve (12) public representations were made in relation to natural values (see Summary of Representations at Appendix 1). Several representations related to marine fish farming activities (and are addressed at Issue 6.9 below). Key issues raised were impacts of increased traffic on roadkill (Tasmanian devils and quolls) and swift parrot impacts from light, noise and increased boat traffic.

### 6.8.4 Evaluation

On-site impacts on biodiversity and natural values are considered unlikely given the proposed intensification and upgrade of the WWTP will not require the clearance of any native vegetation. Impacts on threatened Tasmanian devils, eastern quolls and eastern barred bandicoots are considered possible due to the predicted increase in night-time traffic along Narrows Road. The measures proposed to reduce roadkill incidents are supported and align with aspects of mitigation measures set out in *Survey Guidelines and Management Advice for Development Proposals that may impact on the Tasmanian Devil (Sarcophilus harrisii)* (Natural & Cultural Heritage Division, 2015). However, a permit condition is not considered warranted as the proposed increase in night-time traffic is less than 10%.

### 6.8.5 Conditions

No conditions are required.

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## 6.9 Marine and Coastal

### 6.9.1 Potential impacts

Potential impacts from the proposed intensification are associated with the discharge of increased volumes of treated wastewater. The EIS states the upgrade of the WWTP will reduce existing impacts on threatened species and ecological communities by improving the quality of wastewater discharged.

The WWTP outfall and diffuser are located in Port Esperance in a water depth of 30m on a silty seabed. No change is proposed to either the WWTP outfall or diffuser. There will be no construction works conducted in Port Esperance.

The diffuser is located in the bottom water of Port Esperance which, due to stratified water conditions, reflects oceanic salinity. The EIS states the diffuser was designed to enhance dilution but acknowledges that even though there is full biological secondary treatment and the wastewater is disinfected, high dilution is needed to minimise environmental harm. According to the EIS, initial dilution of the wastewater discharge is 150:1 within 20m of the diffuser and 240:1 at 100m from the diffuser. The proposed upgrades to the WWTP are also stated in the EIS to reduce annual loads for BOD, TSS and TP, and increase a small amount annually for TN (around 120 kg) and ammonia (around 6 kg). BOD (an indicator of organic content), TSS, TP, TN and ammonia would all be reduced to background levels within 20 m of the diffuser.

Appendix H of the EIS provides the results of a shoreline and benthic surveys (conducted in 2019 and 2021). Northern Pacific sea stars, New Zealand screw shells and drift algae were observed in the area. Benthic surveys conducted while the fish factory was operational (April 2021) for the handfish species, Gunns Screw Shell and Tasmanian live-bearing sea star did not find evidence of these species inhabiting the area. No habitat-forming giant kelp was observed in the area.

According to modelling described in the EIS, and as noted in Section 6.1 above, the discharge of treated wastewater will not affect the Protected Environmental Values (PEV) for waters within the D'Entrecasteaux Channel, as the water quality would remain suitable for protection of aquatic ecosystems, recreation and aesthetics and water supply for aquaculture.

### 6.9.2 Management measures proposed in EIS

Improved and effective performance of a WWTP upgraded to an MBR treatment process to ensure compliance with discharge limits will minimise impacts on the marine and coastal environment. Section 6.1 addresses wastewater quality.

The following management measure is listed in Tables 68 and 69 of the EIS:

<b>Marine and coastal (Operational)</b>	
0.14	Monitor discharge water quality and implement improvements if required to maintain compliance

Table 66 of the EIS also outlines proposed monitoring for the operation of the factory and WWTP with this including marine benthic monitoring. The benthic monitoring will comprise annual video inspection of the diffuser and surrounds and infauna sampling (5 years after commissioning of the WWTP).

### 6.9.3 Public and agency comment

Issue 5 Natural Values above notes that several representations were made in relation to the marine environment. Not all representations were clear whether the comments related to the land-based activity or the impacts of marine fish farming. Key issues raised were:

- Impacts on wild fish and animal populations.
- Fish escapes.
- Impact of fish farming on climate refugia for threatened species.
- Query as to whether the fish factory was operational when the benthic survey was conducted.

One representor sought an assessment against the Tasmanian State Coastal Policy.

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#### 6.9.4 Evaluation

No WWTP construction activity is proposed for the marine environment - the existing wastewater discharge pipe and diffuser will continue to be used. Operation of an improved and effective WWTP will improve wastewater discharge quality and should ensure compliance with existing discharge limits at a minimum (see Section 6.1 Wastewater Quality). The intensification of the operation will result in an additional 70kl/day of wastewater (over and above the 650kl/day currently discharged under the temporary increase) being discharged to the marine environment. Given the considerable dilution and water circulation in Port Esperance the increase in wastewater discharge is not considered to cause environmental harm.

The assessment against the Tasmanian Coastal Policy provided in the Supplement to the EIS argues there will be negligible to localised minor impacts on coastal ecology. It is agreed that improvements in the WWTP and consequent effluent quality should reduce current impacts on the marine and coastal environment. The proposed marine benthic monitoring is considered appropriate to monitor ongoing impacts.

No additional conditions to address marine and coastal impacts are required.

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## 6.10 Greenhouse Gases and Ozone Depleting Substances

### 6.10.1 Potential impacts

Greenhouse gases associated with the intensification of the fish processing factory will be generated from increased transport, refrigeration, and LPG consumption (used for temperature control at the WWTP). The estimated increase in GHG emissions from the Dover facility at the full 50,000 t/y production is approximately 159.3 t CO<sub>2</sub>-e, representing a 28% increase over existing levels. No ozone depleting substances would be used at the facility.

### 6.10.2 Management measures proposed in EIS

Tassal reports its energy consumption and greenhouse gas emissions to the Commonwealth Government annually to meet its obligations under the NGER Act. Tassal identifies areas for improvement, providing opportunities to reduce operating costs, enhance environmental performance, and reduce its demand on Tasmania's energy and fuel supplies. Greenhouse gas and energy targets are being developed.

The following management measures are listed in Tables 68 and 69 of the EIS:

<b>Greenhouse gases and ozone depleting substances (Construction)</b>	
C.11	Properly maintain plant & equipment to reduce fuel consumption & minimise emissions

<b>Greenhouse gas and ozone depleting substances (Operational)</b>	
O.15	Continue annual greenhouse gas reporting under the NGER Act

### 6.10.3 Public and agency comment

Five (5) public representations were made in relation to climate change (see Summary of Representations at Appendix I). Some of the representations related to marine fish farming activities. Key issues raised in the representations were:

- Increases in carbon emissions due to the proposal.
- Concerns that climate change would lead to warmer water and fish mortalities.

### 6.10.4 Evaluation

There is currently no requirement under Federal or State legislation for industry to demonstrate offsetting of emissions generated. Condition **G11** requiring a publicly available Annual Environmental Review provides an opportunity for any commitments with respect to reduction of greenhouse gas emissions to be reported.

### 6.10.5 Conditions

The proponent will be required to comply with the following conditions:

- G11** Annual Environmental Review

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## 6.11 Socioeconomic

### 6.11.1 Potential impacts

The intensification of the fish processing factory will generate additional economic activity (capital cost of \$3.5 million) and employment (short-term construction contractors and around 15 new employees) at the facility.

### 6.11.2 Public and agency comment

Twenty-five (25) public representations were made in relation to socio-economic impacts (see Summary of Representations at Appendix I). Some of the representations related to marine fish farming activities. Key issues raised in the representations were:

- Impacts on property prices.
- Loss of amenity.
- Impacts on businesses including tourism and other forms of aquaculture (oysters etc).

### 6.11.3 Evaluation

The objectives of Tasmania's Resource Management and Planning System encompass the social and economic aspects of resource use and development as well as the environmental aspects. It is therefore appropriate for the Board to consider the social and economic aspects of a proposal in its assessment process.

### 6.11.4 Conditions

No conditions are required.

## 6.12 Decommissioning and Rehabilitation

### 6.12.1 Potential impacts

The facility has the potential to cause ongoing environmental, visual and hazard impacts after operations cease if not appropriately decommissioned.

### 6.12.2 Management measures proposed in EIS

The EIS states there are no plans to decommission facilities at the Dover factory. It also notes the existing permit includes requirements for decommissioning and rehabilitation and, should activities permanently cease, the site would be rehabilitated to a natural state or a state suitable for an alternative proposed use. No specific management measures are proposed.

### 6.12.3 Public and agency comment

One representation was received seeking advice as to whether the sludge pond, previously used as part of the facility's wastewater management, had been filled in.

### 6.12.4 Evaluation

Standard conditions relating to both temporary and final closure, and rehabilitation are considered necessary. Condition **DC1** is required to ensure the proponent notifies the Director of the temporary cessation of the activity and Condition **DC2** requires notification of permanent cessation. Condition **DC3** requires a Decommissioning and Rehabilitation Plan to be prepared when cessation of the activity is planned. Condition **DC4** is required to ensure rehabilitation of the site following permanent cessation. Condition **DC5** requires the activity to cease following decommissioning and rehabilitation.

### 6.12.5 Conditions

The proponent will be required to comply with the following conditions:

**DC1** Temporary suspension of activity

**DC2** Notification of cessation

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- DC3**   DRP Requirements
  - DC4**   Rehabilitation following cessation
  - DC5**   Activity to cease following decommissioning

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## 7 Issues not assessed by the Board

The following issues have been raised during the assessment process but are not the responsibility of the Board under the EMPCA. These may be issues which are more appropriately addressed by another regulatory agency.

1. Traffic
2. Fire Risk

### 7.1 Traffic – amenity, road integrity and safety

#### 7.1.1 Potential impacts

Traffic movements during operations are estimated to increase by 22% (an additional 4 heavy vehicles and 27 light vehicles per day) with most of this to occur during the day and a small increase in night-time traffic. Appendix F of the EIS notes in relation to Narrows Road that while there will be no adverse impact to residential amenity, some residents may consider the increased in traffic, particularly heavy vehicles to be unacceptable. Appendix F of the EIS recommends several measures including introducing a speed limit of 50km/h on the unsealed section of road for all vehicles.

#### 7.1.2 Management measures proposed in EIS

Proactive measures are outlined including introducing speed limits and sealing the Huon Highway junction. It is noted the proponent has separately committed to reducing the speed limit along Narrows Road to 40km/h for Tassal vehicles.

#### 7.1.3 Public and agency comment

Twenty-six (26) public representations were made in relation to an increase in traffic (see Summary of Representations at Appendix I). Issues detailed were separate to traffic impacts on wildlife, noise-related impacts, and dust. Key issues raised in the representations were:

- Increased traffic along Narrows Road resulting from the second work shift and waste transport.
- Increase in traffic movements between 10pm and 2am.
- Concerns about road integrity and the need for road maintenance on Narrows Road.
- Impact of increased traffic on the broader region including Dover and Huon Highway and associated safety risks from increased traffic to residents.
- Potential for access to the Bruny Island ferry to be disrupted.
- Concerns about current speed limits.

#### 7.1.4 Conclusion

The Board does not have responsibility for road safety and functionality issues and cannot impose relevant permit conditions. Construction activities are however considered unlikely to cause nuisance to residents on Narrows Road. An increase in operational traffic has the potential to impact on fauna and is addressed in Section 7.8 Biodiversity and Natural Values. Any fauna-related measures adopted to reduce the speed that fish factory vehicles travel along Narrows Road may also benefit local residents. Potential noise impacts from increased operational traffic have been addressed under Section 6.4.

## 7.2 Fire Risk

### 7.2.1 Potential impacts

Uncontrolled bushfire is identified in Appendix E of the EIS as a medium risk in the EIS and requiring mitigation. The proposed intensification and WWTP upgrades are described as not increasing the fire risk at the facility. A Bushfire Hazard Management Plan has been prepared and will be implemented to manage bushfire risk.

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### 7.2.2 Management measures proposed in EIS

The Bushfire Hazard Management Plan includes measures in relation to buildings and fire trails and maintenance of the Hazard Management Area (including separation distances, vegetation management). Tassal has an Emergency Control Organisation in place for the site.

### 7.2.3 Public and agency comment

No representations were received on fire risk.

### 7.2.4 Conclusion

The Board does not have responsibility for fire risk and cannot impose relevant permit conditions. This responsibility sits with the Huon Valley Council.

## 8 Report Conclusions

This assessment has been based on the information provided by the proponent, Tassal Operations Pty Ltd, in the permit application, the case for assessment (the EIS), and additional information provided (Supplement).

This report incorporates specialist advice provided by EPA scientific and regulatory staff, the Department of Natural Resources and Environment Tasmania, and other government agencies, and considers issues raised in public submissions.

The proposal has been assessed in the context of the Objectives and Environmental Impact Assessment Principles specified in EMPCA. It is concluded that the proposal is capable of being managed in an environmentally acceptable manner such that it is unlikely that the RMPS and EMPCS objectives would be compromised, provided that the Permit Conditions - Environmental No. 10627 appended to this report are imposed and duly complied with.

The environmental conditions in Appendix 3 are a new set of operating conditions for the entire, intensified activity that will wholly replace environmental conditions under Permit No. DA 229/2010 (containing PCE No. 7861 as varied by EPN 9635/3, EPN 9365/4 and EPN 9635/5) for the existing activity. Regulatory fees for the proposal should replace regulatory fees for the existing approved activity.

Permit conditions include effluent quality limits. These limits are not dissimilar to current effluent limits with the existing wastewater treatment system. It is expected the new wastewater treatment system will improve wastewater quality. Once the plant has been constructed and commissioned and the results of the WWTP are confirmed, the EPA may determine that effluent quality limits be reduced to reflect the enhanced performance of the new WWTP.

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## 9 Report Approval

**Environmental Assessment Report and conclusions, including environmental conditions, adopted:**



Andrew Paul  
**CHAIRPERSON, BOARD OF THE ENVIRONMENT PROTECTION AUTHORITY**

Meeting date: 3 March, 2026

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## 10 References

- Australian Water Quality Centre, Microbial Indicator Organisms, 2022
- Batley, G. E. & Simpson, S. L., 2019. Short-Term Guideline Values for Chlorine in Marine Waters. *Environmental Toxicology and Chemistry*, 39(4), pp. 754-764.
- HEPA (2025) *PFAS NEMP 3.0 Supporting Document 1, Biosolids criteria derivation for PFOS, PFHxS and PFOA and potential framework to assess biosolids use for land application.*
- Tasmanian Government (1997) *State Policy on Water Quality Management.*
- Tassal Operations Pty Ltd (2023) *Fish Processing Factory Intensification Environmental Impact Statement, Dover, Tasmania; Hobart, Tasmania.*
- Tassal Operations Pty Ltd (2024) *Triabunna Rendering Facility Wastewater Management.*
- Tassal Operations Pty Ltd (2024) *Annual Environmental Review 2024.*

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## II Appendices

- Appendix 1 Summary of public and agency submissions
- Appendix 2 Table of proponent management measures
- Appendix 3 Permit conditions No: 10627

## Appendix I: Summary of representations received during advertising of the EIS

Representation	Comments and Issues	Further info requested	EPA Comments / Additional information required
2, 3, 5, 6, 7, 9, 10, 11, 12, 13, 14, 15, 16, 18, 19, 20, 24, 25, 26, 27, 28, 29, 30, 32, 35, 36, 37, 38, 39, 40, 43, 44, 45, 46	<p>Of the 46 representations received, 34 related to expansion of the salmon industry in the context of the recent government announcement halting any expansion until an independent review into the industry had been completed. This concern related to expansion of both marine operations and land operations.</p> <p>Some representations questioned the source of the fish to support the fish factory intensification. Some queried, if the fish were sourced from increased fish farming without a consequent increase in pen size, the impact of that marine farming intensification.</p>	Yes	To provide adequate context for the proposal rationale, clarify how productivity improvements can be achieved within existing marine farming areas.
2, 3, 4, 5, 7, 8, 9, 10, 14, 15, 16, 18, 19, 21, 22, 23, 27, 32, 33, 34, 35, 36, 37, 39, 40, 44, 46	27 representations related to noise impacts from marine operations, increased vessel movements to supply the fish factory, increased truck movements (and engine brake noise), pumping station operation (associated with the separately regulated net wash facility). Several representations also raised the cumulative impact of noise from all listed sources. Some representations mentioned heavy vehicle vibration as a source of nuisance.	Yes	<p>The activity being assessed is linked to other activities, namely the land-based Dover fish processing factory (Site ID 1544), Meads Creek marine farming lease (Lease No. 077, Zone 13D), net wash (Site Activity ID 5662) and marine operations.</p> <p>To consider potential cumulative impact of noise, provide the following information in relation to all of these activities, as relevant:</p> <ul style="list-style-type: none"> <li>• Current and potentially increased traffic volumes for current and altered traffic (light and heavy vehicles) flows along Narrows Road.</li> <li>• Current and potentially increased vessel (boat) movement numbers.</li> <li>• Assess the potential for cumulative noise emissions from traffic and vessel movements (during operations) to cause nuisance during day, evening and night-time for nearby land</li> </ul>

Representation	Comments and Issues	Further info requested	EPA Comments / Additional information required
			<p>users, particularly at noise sensitive premises<sup>[1]</sup>. When assessing nuisance at noise-sensitive premises, discuss the <a href="#">Environment Protection Policy (Noise) 2009</a><sup>[2]</sup> and the existing acoustic environment.</p> <p>Describe attenuation measures that will be implemented to avoid or mitigate impacts of noise emitted by the proposal (as relevant).</p> <p>Where there are any changes in night-time truck movements, also consider any roadkill mitigations that may be required.</p>
2, 3, 4, 6, 9, 19, 22, 23, 24, 25, 29, 31, 32, 34, 35, 36, 39, 40, 42, 43, 46	<p>21 representations raised concerns in relation to the proposed increased effluent discharge and impacts on water quality; benthic layer; water supply; marine vegetation; shorelines; algal blooms; conservation areas, such as Hope Island; and Port Esperance generally. One representation noted the water quality data presented in the EIS is not recent and queried why the proposed effluent limits are similar to existing limits despite predicted improvements in performance of the wastewater treatment plant. A comparison was sought of the proposal with best practice wastewater treatment.</p> <p>Heavy metal pollution of Port Esperance was noted as a concern and one representor queried why nickels levels in sediment were elevated in Port Esperance. The residual toxicity of effluent was noted as a concern. Some representors called for an independent review of the modelling. One</p>	Yes	<p>Provide wastewater quality data for 2023 and 2024/2025 expanding Tables 10 and 11 of the EIS to include this data.</p> <p>Discuss how the proposed wastewater treatment (MBR) compares with best practice wastewater treatment for similar diverse, episodic and seasonal waste streams.</p>

<sup>[1]</sup> Noise-sensitive premises are defined as ‘residences and residential zones (whether occupied or not), schools, hospitals, caravan parks and similar land uses involving the presence of individual people for extended periods, except in the course of their employment or for recreation.’

<sup>[2]</sup> See [https://epa.tas.gov.au/Documents/EPP\\_Noise\\_2009.pdf](https://epa.tas.gov.au/Documents/EPP_Noise_2009.pdf)

Representation	Comments and Issues	Further info requested	EPA Comments / Additional information required
	representor questioned whether the sludge dam (no longer used) has been filled in.		
5, 7, 9, 16, 22, 24, 25, 29, 36, 41, 42, 46	12 representations were made in relation to natural values. These ranged from land-based impacts of increased traffic on roadkill (Tasmanian devils and quolls) to marine impacts on wild fish and animal populations. Swift parrot impacts from light, noise and increased boat traffic were noted. One representor was concerned about fish escape and another raised the impact of the fish farming on climate refugia for threatened species. The increased nutrient load and potential resultant algal blooms were raised as potential threats to biodiversity. One representor queried whether the fish factory was operational in late April 2021 when the benthic survey was conducted.	Yes	Clarify whether the fish factory was operational when the benthic survey was conducted.
5, 9, 25, 36, 39, 46	6 representations raised concerns about biosecurity measures with specific queries relating to bloodwater, alternative disinfection options, processing of diseased fish, bacterial outbreaks, and fish mortalities. One representation sought clarification about why thermotolerant coliforms are monitored as a measure of biosecurity risk. Antibiotic usage was raised along with the need for expert review.	Yes	As thermotolerant coliforms are included as a limit in the current permit for the fish factory, information about biosecurity impacts of the proposal must be provided. This can take the form of the current Tassal Biosecurity Plan.  In regard to other details, biosecurity is the responsibility of Biosecurity Tasmania rather than the Board.
36	One representor sought an assessment against the Tasmanian State Coastal Policy.	Yes	The EIS lists the State Coastal Policy in Section 1.4.2 and states the protection of coastal values is addressed in Section 5.1.4. The assessment in Section 5.1.4 does not explicitly reference the State Coastal Policy apart from Codes applied by Council. Please provide an assessment of the activity against the State Coastal Policy beyond Code requirements.
1, 3, 7, 8, 9, 10, 12, 14, 15, 16, 18,	28 representations raised concerns about marine and land-based lighting (including from the introduction of an additional shift) and its impacts on	No	Council has required the proponent to install an additional four floodlights in the car parking area.

19, 21, 22, 23, 24, 27, 28, 29, 31, 32, 35, 36, 37, 39, 40, 44, 46	surrounding residents, animals (shorebirds, migratory birds, marine animals), and dark skies.		In the context of the extensive lighting already installed at the site (land-based) the additional four lights are not considered likely to significantly change current environmental impacts.
4, 6, 7, 9, 14, 16, 18, 19, 21, 23, 24, 25, 28, 29, 31, 32, 33, 34, 36, 37, 38, 39, 40, 44, 45, 46	<p>26 representations were received raising concerns about an increase in traffic. Several of these concerns related to traffic along Narrows Road resulting from the second work shift and waste transport. One representor noted the increase in traffic movements between 10pm and 2am. Concerns about road integrity and the need for road maintenance on Narrows Road were also noted.</p> <p>Several representors noted the impact of Impact of increased traffic on the broader region including Dover, Huon Highway and associated safety risks from increased traffic to residents. One representor noted the potential for access to the Bruny Island ferry to be disrupted.</p> <p>General concerns were raised about current speed limits.</p>	No	<p>Sufficient information has been provided in relation to traffic movement impacts on dust and roadkill. Information in relation to traffic noise has been requested.</p> <p>Issues relating to regional traffic impact and safety are not in the Board's area of responsibility.</p>
3, 4, 15, 16, 22, 23, 25, 34, 36, 37, 41, 42, 45	Impacts on businesses (including tourism and other forms of aquaculture such as oysters).	No	Sufficient information has been provided in the EIS to inform the Board's assessment.
2, 6, 8, 10, 11, 16, 24, 25, 29, 35	Impact on boating (navigational impact) and recreational water users.	No	Not in the Board's area of responsibility.
4, 23, 24, 25, 31, 37, 44, 46	8 representations called for the cumulative impact of the proposal (including the processing plant, marine operations, traffic) on the broader community to be assessed. This was raised in the context of other fish farming activities in the region. One representation also noted the need to consider the cumulative impact of the proposal on Port Esperance when considered with other activities in Port Esperance.	No	<p>The cumulative impact of effluent discharge into Port Esperance was considered in the EIS and no further information is considered necessary.</p> <p>Information in relation to traffic noise has been requested.</p>
15, 16, 21, 36, 37, 44, 46	7 representations called for remediation of the environment, establishment of a remediation fund and cost recovery to support remediation of impacts on the environment.	No	The concerns appear to be broadly related to marine fish farming. While broadly relevant to the EPA this is not relevant to the Board's assessment of the land-based fish processing activity.

14, 15, 23, 36, 37, 40	Loss of amenity	No	Not in the Board's area of responsibility.
25, 34, 36, 37, 40, 46	Impact on property prices	No	Not in the Board's area of responsibility.
9, 31, 37, 40, 46	Insufficient community consultation	No	The Board considers stakeholder consultation. Sufficient information has been provided on consultation in the EIS to inform the Board's assessment.
4, 23, 33, 42, 45	Several representations were received with concerns about dust generated by increased traffic. One representation noted concerns about odour.	No	Sufficient information has been provided in the EIS to inform the Board's assessment. Dust generated from traffic on unsealed roads beyond the immediate vicinity of the activity is the responsibility of local Council.
4, 12, 22, 28, 34	Several representations raised concerns about increases in carbon emissions due to the proposal. Some noted that climate change would lead to warmer water with consequent fish mortalities.	No	The EIS details the impacts of the proposal on greenhouse gases. The impacts of climate change on marine fish farming are not within the scope of the land-based fish factory intensification assessment. Marine fish farming is separately regulated by the EPA.
6, 14, 23, 42	Visual impact of marine pens and a general loss of aesthetic in the areas.	No	Not in the Board's area of responsibility.
9, 10, 18	One representor sought additional information on blood water waste management (including storage) and had queries about general waste management and disposal including where waste was disposed and whether these disposal locations had the ability to accommodate additional material. Representations were also made about waste from marine activities and the transport of contaminated waste.	No	Sufficient information has been provided in the EIS on waste management, waste receiving facilities and their ability to receive additional waste.
14, 15, 25	Call for independent monitoring	No	The EPA conducts independent monitoring and auditing of EPA-regulated activities.
25, 44	Risks associated with transport of hazardous materials.	No	Not in the Board's area of responsibility.

9	<p>Concerns raised regarding temporary permission for increases in production. It was also noted the two years needed to construct and commission the wastewater treatment plant and whether this will require further temporary production/effluent discharge increases.</p> <p>The same representor queried whether the Guidelines were still relevant given the time lapsed since they were first issued.</p>	No	<p>Temporary permissions are within the EPA Director's area of responsibility and managed separately to the assessment process.</p> <p>The Guidelines are still considered relevant. The opportunity to request supplementary information from the proponent allows the Board to consider any outstanding issues.</p>
33	<p>Impacts of increased heavy vehicle traffic on Aboriginal midden, coastal stability. Request geotechnical and coastal erosion assessment and heritage assessment.</p>	No	<p>Aboriginal heritage is the responsibility of Aboriginal Heritage Tasmania. AHT have been advised of the potential existence of the midden.</p> <p>Coastal stability and erosion potential outside the activity area under assessment is the responsibility of the local Council.</p>
15	<p>Disclosure of lease fees</p>	No	<p>Not in the Board's area of responsibility</p>

## Appendix 2: Table of proponent management measures

**Table 1: Proponent construction management measures (Table 68 of EIS)**

ID	MANAGEMENT MEASURES
<b>Construction management</b>	
C.A	Develop a Construction Environmental Management Plan in accordance with Section 6.14.4, which addresses as a minimum: <ul style="list-style-type: none"> <li>• Site management</li> <li>• Erosion and sediment control</li> <li>• Dust management</li> <li>• Noise management</li> <li>• Waste management</li> <li>• Flora &amp; fauna management</li> <li>• Biosecurity requirements</li> </ul>
C.B	Develop a Commissioning Plan in accordance with Section 2.2, which addresses as a minimum: <ul style="list-style-type: none"> <li>• The planned commissioning process and staging, including hold points</li> <li>• Inspection and testing requirements</li> <li>• Checks to be conducted during commissioning</li> <li>• Investigation procedures and corrective actions for non-compliances during the commissioning process</li> <li>• Training and hand-over requirements</li> </ul>
<b>Air quality</b>	
C.01	Avoid the use of long-term stockpiles onsite
C.02	Stabilise access to the site to minimise dust entrainment from vehicles
C.03	Properly maintain all equipment used on site to minimise exhaust emissions
<b>Water quality</b>	
C.04	Install & maintain ESC measures in accordance with <i>Soil &amp; Water Management on Standard Building &amp; Construction Sites</i> (EPA, 2008)
<b>Noise</b>	
C.05	Limit construction hours to Monday to Friday from 7 a.m. to 6 p.m. & Saturday from 8 a.m. to 1 p.m.
C.06	Properly maintain plant & equipment to minimise noise emissions
<b>Waste management</b>	
C.07	Store all waste materials generated by the construction activities in appropriate containers & remove from site, either for disposal at an appropriately authorised facility or to be transported directly to an authorised recycler/re-user
<b>Dangerous goods and environmentally hazardous materials</b>	
C.08	Store, handle, transport and dispose of all chemicals & DGHS in accordance with established procedures
C.09	Follow established spill & emergency response procedures in the event of a spill or leak
<b>Flora and fauna</b>	
C.10	Implement a weed hygiene plan, which addresses minimum requirements including: <ul style="list-style-type: none"> <li>• A washdown history for all machinery used for earthworks</li> <li>• Inspection &amp; cleaning protocols for vehicles &amp; equipment that has been transferred from another site</li> <li>• Inspections &amp; cleaning protocols for vehicles &amp; equipment before leaving the site</li> <li>• Inspection &amp; monitoring requirements to detect weed infestation</li> </ul>
<b>Greenhouse gases and ozone depleting substances</b>	
C.11	Properly maintain plant & equipment to reduce fuel consumption & minimise emissions
<b>Fire management</b>	
C.12	Properly maintain plant & equipment to minimise potential for fires on site
C.13	Implement fire and emergency preparedness and response measures as required under existing policies and procedures

**Table 2: Proponent operational management measures (Table 69 of EIS)**

ID	MANAGEMENT MEASURES
	<b>Management plans</b>
O.A	Maintain & update the WWTP Solids Management Plan on an annual basis
O.B	Maintain & update the Bushfire Management Plan on a regular basis
O.C	Maintain and update existing factory management plans on a regular basis, including: <ul style="list-style-type: none"> <li>• PRO-171 Emergency Procedures – Dover Wet Processing</li> <li>• PRO-175 Waste Management &amp; Disposal at Processing Sites</li> <li>• WHS-110 Dangerous Goods and Hazardous Substances</li> </ul>
	<b>Air quality</b>
O.01	Properly maintain all equipment to minimise exhaust emissions
O.02	Manage WWTP solids in accordance with the WWTP Solids Management Plan to minimise odours
O.03	Investigate the cause of any odour complaint and implement mitigation/attenuation as required
	<b>Water quality</b>
O.04	Water quality monitoring at the discharge point from the WWTP, and at the outfall discharge location in accordance with permit conditions
O.05	Operate the WWTP to comply with water quality discharge limits
	<b>Groundwater</b>
O.06	Continue the existing annual groundwater quality monitoring regime until 2025
	<b>Noise</b>
O.07	Investigate the cause of any noise complaint & implement mitigation/attenuation as required
	<b>Waste management</b>
O.08	Manage all fish by-products following established biosecurity procedures
O.09	Sort, store & transport wastes in appropriate containers & in a way that minimises waste sent to landfill
	<b>Dangerous goods and environmentally hazardous materials</b>
O.10	Store, handle, transport & dispose of all chemicals & DGHS in accordance with established procedures
O.11	Follow established spill & emergency response procedures in the event of a spill or leak
	<b>Flora and fauna</b>
O.12	Continue existing annual weed control program
O.13	To reduce risks of roadkill incidents: <ul style="list-style-type: none"> <li>• Limit speeds of Tassal vehicles on Narrows Road between dusk and dawn to 40 km/h</li> <li>• Install signage warning of wildlife on the road after dusk</li> <li>• Regularly inspect the road and remove dead wildlife if safe to do so, and</li> <li>• Record roadkill deaths, and report deaths of Tasmanian devils, quolls, or eastern barred bandicoots to DNRET.</li> </ul>
	<b>Marine and coastal</b>
O.14	Monitor discharge water quality and implement improvements if required to maintain compliance
	<b>Greenhouse gas and ozone depleting substances</b>
O.15	Continue annual greenhouse gas reporting under the NGER Act
	<b>Fire management</b>
O.16	Maintain & implement fire & emergency preparedness & response measures as required under existing policies and procedures
O.17	Maintain bushfire protection measures as outlined in the Bushfire Management Plan

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**Appendix 3: Permit conditions – Environmental No. 10627**

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**PERMIT PART B**  
**PERMIT CONDITIONS - ENVIRONMENTAL No. 10627**

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Issued under the *Environmental Management and Pollution Control Act 1994*

Activity: **The operation of a fish processing facility (ACTIVITY TYPE: Fish Processing (works not discharging all wastewater to external approved Wastewater Treatment Works).)**  
**DOVER FISH PROCESSING FACTORY, 564 NARROWS ROAD**  
**DOVER TAS 7117**

The above activity has been assessed as a level 2 activity under the *Environmental Management and Pollution Control Act 1994*.

Acting under Section 25(5)(a)(i) of the EMPCA, the Board of the Environment Protection Authority has required that this Permit Part B be included in any Permit granted under the *Land Use Planning and Approvals Act 1993* with respect to the above activity.

Municipality: **HUON VALLEY**  
Permit Application Reference: **DA 65/2024**  
EPA file reference: **256499**

Date conditions approved: 12 March 2026

Signed:



CHAIRPERSON, BOARD OF THE ENVIRONMENT  
PROTECTION AUTHORITY

## DEFINITIONS

Unless the contrary appears, words and expressions used in this Permit Part B have the meaning given to them in **Schedule 1** of this Permit and in the EMPCA. If there is any inconsistency between a definition in the EMPCA and a definition in this Permit Part B, the EMPCA prevails to the extent of the inconsistency.

## ENVIRONMENTAL CONDITIONS

The person responsible for the activity must comply with the conditions contained in **Schedule 2** of this Permit Part B.

## INFORMATION

Attention is drawn to **Schedule 3**, which contains important additional information.

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***Attachments***

Attachment 1: Activity Area (modified: 12/02/2026 10:17)..... 1 page

Attachment 2: Monitoring Point 1 (modified: 12/02/2026 10:19)..... 1 page

## Schedule 1: Definitions

In this Permit Part B:-

**90th Percentile** means the value at which the relevant parameter is exceeded by no more than 10 percent of all sample results over a twelve month period.

**Activity** means any environmentally relevant activity (as defined in Section 3 of EMPCA) to which this document relates, and includes more than one such activity.

**Activity Area** means the area to be used for the Activity when these conditions take effect, as depicted in Attachment 1.

**Authorized Officer** means an authorized officer under section 20 of EMPCA.

**Blood Water** means segregated wastewater generated from the bleeding of harvested finfish on harvest vessels.

**Commissioning** means the testing of major items of equipment and is taken to be completed when the item(s) are being used or operated in the course of normal commercial operations.

**Construction** means activities associated with the construction phase of the activity, including but not limited to, activities associated with the clearance of vegetation, site works to create a level site, rock breaking, installation of fences and other infrastructure whether on land or in water.

**Contingency Management Plan** means the document titled *Dover Factory Waste Contingency Management Plan*, by Tassal Operations Pty Ltd, dated May 2021 and includes any amendment to or substitution of this document approved in writing by the Director.

**Control Location (Noise)** means a location chosen to represent the general ambient sound without contribution from noise sources at the activity.

**Director** means the Director, Environment Protection Authority holding office under section 18 of EMPCA and includes a delegate or person authorised in writing by the Director to exercise a power or function on the Director's behalf.

**Disinfection Plan** means the document titled *Tassal Pty Ltd, Dover Wastewater Treatment Plant Upgrade, Wastewater Disinfection Plan*, dated December 2012 and includes any amendment to or substitution of this document approved in writing by the Director.

**DRP** means Decommissioning and Rehabilitation Plan.

**Effluent** means wastewater discharged from the Activity Area.

**EMPCA** means the *Environmental Management and Pollution Control Act 1994*.

**Environmental Harm** and **Material Environmental Harm** and **Serious Environmental Harm** each have the meanings ascribed to them in Section 5 of EMPCA.

**Environmental Nuisance** has the meanings ascribed to it in Section 3 of EMPCA.

**Environmentally Hazardous Material** means any substance or mixture of substances of a nature or held in quantities which present a reasonably foreseeable risk of causing serious or material environmental harm if released to the environment and includes fuels, oils, waste and chemicals but excludes sewage.

**EPA Board** means the Board of the Environment Protection Authority established under section 13 of EMPCA and includes a delegate or person authorised in writing by the EPA Board to exercise a power or function on the EPA Board's behalf.

**Finfish** has the meaning described in section 3(1) of the EMPCA.

**Groundwater Monitoring Plan** means the document titled *Tassal Group Limited - Dover Wet Processing Facility - Groundwater Monitoring Plan*, by Tassal Group Limited, dated August 2018 and includes any amendment to or substitution of this document approved in writing by the Director.

**Median** means the value at which the relevant parameter is exceeded by no more than 50 percent of all results for the relevant parameter from a 12 month period.

**Monitoring Point 1** means the location shown as Sample Point in Attachment 5.

**Noise Measurement Procedures Manual** means the document titled *Noise Measurement Procedures Manual*, by the Department of Environment, Parks, Heritage and the Arts, dated July 2008, and any amendment to or substitution of this document.

**Noise Sensitive Premises** means residences and residential zones (whether occupied or not), schools, hospitals, caravan parks and similar land uses involving the presence of individual people for extended periods, except in the course of their employment or for recreation.

**Non-Trivial Environmental Incidents** means an incident requiring the person responsible to implement actions to control or respond to the incident to minimise environmental harm and/or nuisance.

**Person Responsible** is any person who is or was responsible for the environmentally relevant activity to which this document relates and includes the officers, employees, contractors, joint venture partners and agents of that person, and includes a body corporate.

**Planning Authority** means the Council(s) for the municipal area(s) in which the Activity Area is situated.

**Pollutant** has the meaning ascribed to it in section 3 of EMPCA.

**Putrescible Waste** means waste containing materials that are capable of rapid biological decay or rotting.

**Reporting Period** means the 12 months ending on 31 December of each year.

**Stormwater** means water runoff as a consequence of a rainfall event, whether surface flow, piped flow, or flow within conduits, including any contaminants collected by the water during its passage.

**Waste** has the meaning ascribed to it in Section 3 of EMPCA.

**Wastewater** means spent or used water (whether from industrial or domestic sources) containing a pollutant and includes stormwater which becomes mixed with wastewater.

**Wastewater Reuse EMP** means the document entitled [name of reuse EMP, author and date] and includes any amendment to or substitution of this document approved in writing by the Director.

**Wastewater Solids** means the primary solid organic product produced by wastewater treatment processing. These solids cease to be defined as wastewater solids when they are in a suitable form for beneficial use, at which time they become known as biosolids.

**Wastewater Treatment Plant** means the infrastructure located in the Activity Area located 1214 Narrows Road, Strathblane, for the purpose of treating wastewater from the activity, blood water received in the Activity Area, wastewater from the net maintenance facility, and brine from the Triabunna rendering facility.

**Weed** means a plant species that has, or is likely to have, an adverse impact on the environment because of the introduction, spread or increase in population size of the species in an area; and includes a declared weed as defined in the *Biosecurity Act 2019* and subordinate regulations.

## Schedule 2: Conditions

### Maximum Quantities

#### **Q1 Regulatory limits**

- 1 The activity must not exceed the following limits :
  - 1.1 50,000 tonnes per year of product produced.
  - 1.2 720 kL/day of Effluent discharged to Discharge Point 1

### General

#### **G1 Activity Area**

The activity must be confined to the Activity Area.

#### **G2 Access to and awareness of conditions and associated documents**

A copy of these conditions and any associated documents referred to in these conditions must be held in a location that is known to and accessible to the person responsible for the activity. The person responsible for the activity must ensure that all persons who are responsible for undertaking work within the Activity Area, including contractors and sub-contractors, are familiar with these conditions to the extent relevant to their work.

#### **G3 Incident response**

If an incident causing or threatening environmental nuisance, serious environmental harm or material environmental harm from pollution occurs in the course of the activity, then the person responsible for the activity must immediately take all reasonable and practicable action to minimise any adverse environmental effects from the incident.

#### **G4 Proposed change to activity**

- 1 The person responsible must notify the Director in writing prior to implementing any change to the activity authorised by this document that may cause or increase the emission of a pollutant or which may result in environmental harm or environmental nuisance (even temporarily). A change includes, but is not limited to, any of the following:
  - 1.1 an increase in the discharge of a pollutant, or the location of its discharge.
  - 1.2 the construction, installation, alteration or removal of any structure or equipment used in the course of carrying out the activity.
  - 1.3 any clearance of native vegetation or earthworks.
  - 1.4 a change in the quantity or characteristics of materials used in carrying out the activity.
- 2 The notification must be in an approved form and include the following:
  - 2.1 details of the proposed change;
  - 2.2 an assessment of the environmental impacts that may result from the change;
  - 2.3 any relevant approvals held by the person responsible; and
  - 2.4 any advice from the relevant planning authority to the effect that approval is not required.
- 3 The person responsible must provide additional information as requested by an Authorized Officer.

- 4 The proposed change must not be implemented until the Director has confirmed in writing that they are satisfied that no other approval or variation of this document is required.
- 5 For the avoidance of doubt, a notification of a proposed change under this provision is not required if the proposed change is part of a referral to the EPA Board for assessment under sections 24, 25, 27 or 27AA of EMPCA.

**G5 Change of responsibility**

If the person responsible for the activity intends to cease to be responsible for the activity, that person must notify the Director in writing of the full particulars of any person who will become the person responsible for the activity, before such cessation.

**G6 Change of ownership**

If the owner of the Activity Area changes or is to change, then, as soon as reasonably practicable but no later than 30 days after becoming aware of the change or intended change in the ownership of the Activity Area, the person responsible must notify the Director in writing of the change or intended change of ownership.

**G7 Complaints register**

- 1 A public complaints register must be maintained. The public complaints register must, as a minimum, record the following detail in relation to each complaint received in which it is alleged that environmental harm (including an environmental nuisance) has been caused by the activity:
  - 1.1 the date and time at which the complaint was received;
  - 1.2 contact details for the complainant (where provided);
  - 1.3 the subject matter of the complaint;
  - 1.4 any investigations undertaken with regard to the complaint; and
  - 1.5 the manner in which the complaint was resolved, including any mitigation measures implemented.
- 2 Complaint records must be retained for a period of at least 3 years.

**G8 Completion of commissioning**

- 1 Prior to completion of commissioning the Wastewater Treatment Plant upgrade, the person responsible for the activity must notify the Director of the date on which commissioning is expected to be completed.
- 2 Following completion of commissioning, the final layout and confirmation of equipment installed must be provided to the Director.

**G9 Amendment of required plans and reports**

- 1 The plans and reports required by these conditions must be amended to address any matter required by the Director, as advised by notice in writing.
- 2 Amended plans and reports must be resubmitted within the timeframe that the Director specifies.

**G10 Annual Environmental Review**

- 1 Unless otherwise specified in writing by the Director, a publicly available Annual Environmental Review for the activity must be submitted to the Director each year within three months of the end of the reporting period. Without limitation, each Annual Environmental Review must include the following information:
  - 1.1 a statement by the General Manager, Chief Executive Officer or equivalent for the activity acknowledging the contents of the Annual Environmental Review;

- 1.2 subject to the *Personal Information Protection Act 2004*, a list of all complaints received from the public during the reporting period concerning actual or potential environmental harm or environmental nuisance caused by the activity and a description of any actions taken as a result of those complaints;
- 1.3 details of environment-related procedural or process changes that have been implemented during the reporting period;
- 1.4 details of actual consumption or production volumes/rates for the reporting period and an analysis of compliance against regulatory limit(s);
- 1.5 a summary of the amounts (tonnes or litres) of both solid and liquid wastes produced and treatment methods implemented during the reporting period. Initiatives or programs planned to avoid, minimise, re-use, or recycle such wastes over the next reporting period should be detailed;
- 1.6 details of all non-trivial environmental incidents and/or incidents of non compliance with these conditions that occurred during the reporting period, and any mitigative or preventative actions that have resulted from such incidents;
- 1.7 a summary of the monitoring data and record keeping required by these conditions. This information should be presented in graphical form where possible, including comparison with the results of at least the preceding reporting period. Special causes and system changes that have impacted on the parameters monitored must be noted. Explanation of significant deviations between actual results and any predictions made in previous reports must be provided;
- 1.8 identification of breaches of limits specified in these conditions and significant variations from predicted results contained in any relevant EIS or EMP, an explanation of why each identified breach of specified limits or variation from predictions occurred and details of the actions taken in response to each identified breach of limits or variance from predictions;
- 1.9 a list of any issues, not discussed elsewhere in the report, that must be addressed to improve compliance with these conditions, and the actions that are proposed to address any such issues;
- 1.10 a summary of fulfilment of environmental commitments made for the reporting period. This summary must include indication of results of the actions implemented and explanation of any failures to achieve such commitments; and
- 1.11 a summary of any community consultation and communication undertaken during the reporting period.

### **G11 Temporary Production Increase**

Notwithstanding condition Q1 of these conditions, the activity must not exceed a limit of 34,000 tonnes per year of product produced until the commissioning of the Wastewater Treatment Plant upgrade required by these conditions has been completed.

### **Atmospheric**

#### **A1 Odour management**

The person responsible must institute such odour management measures as are necessary to prevent odours causing environmental nuisance beyond the boundary of the Activity Area.

## **Commissioning**

### **CM1 Process Commissioning Plan**

- 1** Unless otherwise approved in writing by the Director, at least 30 days prior to the commencement of process commissioning for the Wastewater Treatment Plant upgrades, the person responsible must submit to the Director a Process Commissioning Plan.
- 2** Unless otherwise approved in writing by the Director, the Process Commissioning Plan must include:
  - 2.1** a description of the key milestones and procedures for undertaking process commissioning including all pre-commissioning inspection, calibration and testing of equipment, and the stages at which wastewater flows will be introduced to the upgraded Wastewater Treatment Plant;
  - 2.2** a proposed timeline for the key milestones of process commissioning and progress reporting to the Director;
  - 2.3** procedures for notifying the Director prior to the integration of process liquor to the upgraded Wastewater Treatment Plant;
  - 2.4** appropriate mitigation measures to ensure non-compliant effluent is not discharged from the new Wastewater Treatment Plant.

## **Construction**

### **CN1 Wastewater Treatment Plant Upgrades**

- 1** At least 30 days prior to commencement of construction of the Wastewater Treatment Plant, a report on the Wastewater Treatment Plant design must be provided to the Director. This requirement will be deemed to be satisfied only when the Director indicates in writing that the submitted document adequately addresses the requirements of this condition.
- 2** The submission of the proposed upgrade design and works is to include:
  - 2.1** a description of the operational design;
  - 2.2** how the proposed equipment and infrastructure will integrate with existing Wastewater Treatment Plant equipment and infrastructure;
  - 2.3** sufficient information to demonstrate the proposed design and operation will ensure compliance with these conditions; and
  - 2.4** timeframes for construction and commissioning.

## **Decommissioning And Rehabilitation**

### **DC1 Temporary suspension of activity**

- 1** Within 30 days of becoming aware of any event or decision which is likely to give rise to the temporary suspension of the activity, the person responsible for the activity must notify the Director in writing of that event or decision. The notice must specify the date upon which the activity is expected to suspend or has suspended.
- 2** During temporary suspension of the activity the Activity Area must be managed and monitored by the person responsible for the activity to ensure that emissions from the Activity Area do not cause serious environmental harm, material environmental harm or environmental nuisance.

- 3 If required by the Director, a Care and Maintenance Plan for the activity must be submitted to the Director for approval, by a date specified in writing by the Director. This requirement will be deemed to be satisfied only when the Director indicates in writing that the submitted document adequately addresses the requirements of this condition.
  - 3.1 The plan must be prepared in accordance with any guidelines provided by the Director.
  - 3.2 Once approved the person responsible must act in accordance with the approved Care and Maintenance Plan.
  - 3.3 The person responsible may apply to the Director to vary or substitute the Care and Maintenance Plan. Any variation or substitution of the plan approved by the Director, by notice in writing, replaces the earlier approval with effect from the date specified in the notice.
- 4 Unless otherwise approved in writing by the Director, if the activity on the Activity Area has substantially ceased for 2 years, decommissioning of the activity and rehabilitation of the Activity Area must be carried out in accordance with the requirements of these conditions as if the activity has permanently ceased.

#### **DC2 Notification of cessation**

Within 30 days of becoming aware of any event or decision which is likely to give rise to the permanent cessation of the activity, the person responsible for the activity must notify the Director in writing of that event or decision. The notice must specify the date upon which the activity is expected to cease or has ceased.

#### **DC3 DRP requirements**

- 1 Unless otherwise approved in writing by the Director, a Decommissioning and Rehabilitation Plan (DRP) for the activity must be submitted for approval to the Director within 30 days of the Director being notified of the planned cessation of the activity. The DRP must be prepared in accordance with any guidelines provided by the Director. This requirement will be deemed to be satisfied only when the Director indicates in writing that the submitted document adequately addresses the requirements of this condition.
- 2 The person responsible may apply to the Director to vary or substitute the DRP. Any variation or substitution of the plan approved by the Director, by notice in writing, replaces the earlier approval with effect from the date specified in the notice.

#### **DC4 Rehabilitation following cessation**

- 1 Following permanent cessation of the activity, and unless otherwise approved in writing by the Director, the Activity Area must be rehabilitated including:
  - 1.1 stabilisation of any land surfaces that may be subject to erosion;
  - 1.2 removal or mitigation of all environmental hazards or land contamination, that might pose an ongoing risk of causing environmental harm; and
  - 1.3 decommissioning of any equipment that has not been removed.
- 2 Where a Decommissioning and Rehabilitation Plan (DRP) has been approved by the Director, decommissioning and rehabilitation must be carried out in accordance with that plan.
- 3 The person responsible may apply to the Director to vary or substitute the DRP. Any variation or substitution of the plan approved by the Director, by notice in writing, replaces the earlier approval with effect from the date specified in the notice.

**DC5 Activity to cease following decommissioning and rehabilitation**

- 1 Following written notification by the Director confirming the completion of decommissioning of the Activity and rehabilitation of the Activity Area in accordance with these conditions:
  - 1.1 the Activity must not recommence; and
  - 1.2 the Person Responsible is not required to undertake monitoring, reporting and/or notification condition requirements relating to the activity, unless otherwise specified in writing by the Director.

**Effluent Disposal****E1 Solid matter in wastewater**

- 1 Solid matter must be prevented by all reasonable means from entering the wastewater stream. Without limiting the generality of the term, reasonable means includes:
  - 1.1 effective screening at all points of wastewater ingress to the wastewater treatment system to prevent the entry of gross solids;
  - 1.2 implementation of comprehensive operating procedures, and the appropriate training and supervision of employees, contractors and sub-contractors; and
  - 1.3 good housekeeping including the provision of adequate containers to avoid loss to the floor and the control of spillage by sweeping, shovelling, impoundment, or the entrapment of wastes in tanks or vessels for further treatment before disposal.

**E2 Stormwater**

- 1 Unless otherwise approved in writing by the Director:
  - 1.1 Polluted stormwater that will be discharged from the Activity Area must be collected and treated prior to discharge to the extent necessary to prevent serious or material environmental harm, or environmental nuisance.
  - 1.2 Notwithstanding the above, all stormwater that is discharged from the Activity Area must not carry pollutants such as sediment, oil and grease in quantities or concentrations that are likely to degrade the visual quality of any receiving waters outside the Activity Area.

**E3 Effluent discharge locations**

- 1 Unless otherwise approved in writing by the Director, effluent from the activity must only be discharged to the following discharge point:
  - 1.1 Discharge Point in Port Esperance at approximate grid reference E504246 and N5201550.

**E4 Interim Effluent quality limits for discharge to water**

- 1 The pH of effluent discharged to water must be between 6.5 and 8.5 (inclusive).
- 2 For a period of 12 months from completion of commissioning of wastewater treatment plant upgrades, the concentrations in effluent of substances or measures listed in Column 1 of the Table of Effluent Quality Limits below must not exceed the limits specified in Columns 3, 4 and 5 at Monitoring Point 1 when measured in the units specified in Column 2. For the purpose of this condition 'median' means the value at which the relevant parameter is exceeded by no more than 50 percent of all sample results over a 12 month period, '90th percentile' means the value at which the relevant parameter is exceeded by no more than 10 percent of all sample results over a twelve month period.

### 3 Table of Effluent Quality Limits

Column 1	Column 2	Column 3	Column 4	Column 5
Substance or measure	Unit of measurement	Median limit	90th Percentile limit	Maximum limit
Biochemical Oxygen Demand	mg/L	10	15	20
Suspended Solids	mg/L	10	20	30
Ammonia Nitrogen	mg/L	5	10	12
Total Nitrogen	mg/L	15	20	30
Total Phosphorus	mg/L	1	3	5
Oil and Grease	mg/L	2	5	10
Thermotolerant Coliforms	cfu/100mL	200	500	750
Total Residual Chlorine	mg/L	-	-	1

#### E5 Effluent quality limits for discharge to water

- 1 Unless otherwise approved or directed in writing by the Director, 12 months after commissioning of the wastewater treatment plant upgrade, the effluent quality of the discharge to water from the Activity Area must comply with the following:
  - 1.1 The pH must be between 6.5 and 8.5 (inclusive).
  - 1.2 The concentrations in effluent of substances or measures listed in Column 1 of the Table of Effluent Quality Limits below must not exceed the limits specified in Columns 3, 4 and 5 at Monitoring Point 1 when measured in the units specified in Column 2. For the purpose of this condition 'median' means the value at which the relevant parameter is exceeded by no more than 50 percent of all sample results over a 12 month period, '90th percentile' means the value at which the relevant parameter is exceeded by no more than 10 percent of all sample results over a twelve month period.

## 2 Table of Effluent Quality Limits

Column 1	Column 2	Column 3	Column 4	Column 5
Substance or measure	Unit of measurement	Median limit	90th Percentile limit	Maximum limit
Biochemical Oxygen Demand	mg/L	10	15	20
Suspended Solids	mg/L	10	20	30
Ammonia Nitrogen	mg/L	1	2	5
Total Nitrogen	mg/L	15	20	30
Total Phosphorus	mg/L	1	3	5
Oil and Grease	mg/L	2	5	10
Thermotolerant Coliforms	cfu/100mL	-	-	750
Total Residual Chlorine	mg/L			1

### E6 Exceedance of emission limits

- 1 In the event that any of the emission limits specified in these conditions are exceeded:
  - 1.1 The Director must be notified within 24 hours of the person responsible becoming aware of the exceedance.
    - 1.1.1 The notification must include details of the limit that has been exceeded, the amount of the exceedance, the nature of the exceedance, and any immediate actions taken in response to the exceedance; known at the time of the notification.
  - 1.2 A report must be forwarded to the Director within 30 days of becoming aware of the exceedance. The report must include, but not necessarily be limited to, the following:
    - 1.2.1 the reported concentration;
    - 1.2.2 an explanation as whether the exceedance is likely to have caused or threatened environmental harm and or nuisance;
    - 1.2.3 an explanation as to why the emission limit was exceeded;
    - 1.2.4 actions taken to control the exceedance;
    - 1.2.5 the results of re-sampling of the monitoring point/s at which the exceedance was recorded;
    - 1.2.6 proposed actions to limit the likelihood of a recurrence of the exceedance; and
    - 1.2.7 any other information that would assist the Director to understand the exceedance.
  - 1.3 Unless otherwise approved in writing by the Director, the proposed actions to limit the likelihood of a recurrence must be implemented once approved by the Director. These actions may be amended from time to time with the written approval of the Director.

## **Hazardous Substances**

### **H1 Spill kits**

Spill kits appropriate for the types and volumes of materials handled within the Activity Area must be kept in appropriate locations and maintained in a functional condition to assist with the containment of spilt environmentally hazardous materials.

### **H2 Storage and handling of hazardous materials**

- 1** Unless otherwise approved in writing by the Director, environmentally hazardous materials held within the Activity Area must be:
  - 1.1** stored within maintained and functional impervious bunded areas, spill trays or other containment systems; and
  - 1.2** managed to prevent unauthorised discharge, emission or deposition of pollutants:
    - 1.2.1** to soils within the boundary of the Activity Area in a manner that is likely to cause serious or material environmental harm;
    - 1.2.2** to groundwater;
    - 1.2.3** to waterways; or
    - 1.2.4** beyond the boundary of the Activity Area.

## **Monitoring**

### **M1 Samples and measurements for monitoring purposes**

- 1** Any sample or measurement required under these conditions must be taken and processed in accordance with the following:
  - 1.1** sampling and measuring must be undertaken by a person with training, experience, and knowledge of the appropriate procedure;
  - 1.2** the integrity of samples must be maintained prior to delivery to a testing facility;
  - 1.3** sample analysis must be conducted by a testing facility accredited by the National Association of Testing Authorities (NATA), or a testing facility approved in writing by the Director, for the specified test;
  - 1.4** details of methods employed in taking samples and measurements and results of sample analysis, and measurements must be retained for at least three (3) years after the date of collection; and
  - 1.5** sampling and measurement equipment must be maintained and operated in accordance with manufacturer's specifications and records of maintenance must be retained for at least three (3) years.

### **M2 Interim Effluent monitoring**

- 1** Unless otherwise approved in writing by the Director, effluent samples must be:
  - 1.1** collected for a period of 12 months from completion of commissioning of wastewater treatment plant upgrades by grab sampling at Monitoring Point 1; and
  - 1.2** analysed for the parameters specified in Column 1 of the table below, at the frequency specified in Column 3 of that table and measured in the units specified in Column 2 of that table.

## 2 Table of Wastewater Monitoring Requirements

Column 1 - Parameter	Column 2 - Unit	Column 3 - Frequency
Flow	L/h	Continuous
pH	unit	Daily
Biological Oxygen Demand	mg/L	Fortnightly
Total Suspended Solids	mg/L	Fortnightly
Ammonia Nitrogen	mg/L	Fortnightly
Total Nitrogen	mg/L	Fortnightly
Nitrate and Nitrite Nitrogen	mg/L	Fortnightly
Total Phosphorus	mg/L	Fortnightly
Dissolved Reactive Phosphorus	mg/L	Fortnightly
Oil and Grease	mg/L	Fortnightly
Thermotolerant Coliforms	CFU/100mL	Fortnightly
Total Residual Chlorine	mg/L	Fortnightly
Total Copper	mg/L	Fortnightly
Total Zinc	mg/L	Fortnightly

- 3 Unless otherwise approved in writing by the Director, the results of the wastewater monitoring must be reported to the Director quarterly.

### M3 Effluent monitoring

- 1 Unless otherwise approved in writing by the Director, 12 months after commissioning of the wastewater treatment plant upgrades, effluent samples must be:
- 1.1 collected by grab sampling at Monitoring Point 1; and
  - 1.2 analysed for the parameters specified in Column 1 of the table below, at the frequency specified in Column 3 of that table and measured in the units specified in Column 2 of that table.

## 2 Table of Wastewater Monitoring Requirements

Column 1 - Parameter	Column 2 - Unit	Column 3 - Frequency
Flow	L/h	Continuous
pH	unit	Daily
Biological Oxygen Demand	mg/L	Monthly
Total Suspended Solids	mg/L	Monthly
Ammonia Nitrogen	mg/L	Monthly
Total Nitrogen	mg/L	Monthly
Nitrate and Nitrite Nitrogen	mg/L	Monthly
Total Phosphorus	mg/L	Monthly
Dissolved Reactive Phosphorus	mg/L	Monthly
Oil and Grease	mg/L	Monthly
Thermotolerant Coliforms	CFU/100mL	Monthly
Total Residual Chlorine	mg/L	Monthly
Total Copper	mg/L	Monthly
Total Zinc	mg/L	Monthly

- 3 Unless otherwise approved in writing by the Director, the results of the wastewater monitoring must be reported to the Director quarterly.

### M4 Stormwater monitoring

- 1 Unless otherwise specified in writing by the Director, collection of representative samples of stormwater from unsegregated areas, must be:
- 1.1 undertaken at least twice a reporting period, with at least three (3) months between monitoring events and one of the monitoring events occurring in winter, and
  - 1.2 analysed for the parameters specified in Column 1 and measured in the units specified in Column 2 of the table below.
- 2 Table of Stormwater Monitoring Requirements

Column 1 - Parameter	Column 2 - Unit of measurement
Total Suspended Solids	mg/L
Total Nitrogen	mg/L
Ammonia Nitrogen	mg/L
Nitrate and Nitrite Nitrogen	mg/L
pH	pH units
Oil and Grease	mg/L
Total Recoverable Hydrocarbons (TRH)	mg/L
Total Phosphorous	mg/L
Flow	L/h

- 3 Unless otherwise approved in writing by the Director, the results of the stormwater monitoring must be reported in the Annual Environmental Review required by these conditions.

#### **M5 Monitoring during process shutdowns**

- 1 Notification of a fish processing shutdown must be provided to the Director prior to the commencement of the shutdown. The notification must:
  - 1.1 be made no later than seven (7) days prior to the shutdown;
  - 1.2 provide details of when fish processing will suspend and the expected date of recommencement.
- 2 The Director must be advised of any changes to the suspension and recommencement dates.
- 3 Unless otherwise advised in writing by the Director wastewater monitoring required by these conditions is suspended for the duration of the shutdown.

#### **Noise Control**

##### **N1 Noise complaints**

In the event that a noise complaint is received in relation to the Activity Area, the complaint must be reported to the Director within 24 hours.

##### **N2 Noise survey requirements**

- 1 If directed by the Director, a noise survey must be completed:
  - 1.1 Within six (6) months after any change to the activity which is likely to substantially alter the character or increase the volume of noise emitted from the Activity Area; or
  - 1.2 Within a timeframe specified by the Director.

##### **N3 Noise survey method and reporting requirements**

- 1 Noise surveys must be undertaken in accordance with a survey method approved in writing by the Director, as may be amended from time to time with written approval of the Director.
- 2 Without limitation, the survey method must address the following:
  - 2.1 measurements must be carried out at day, evening and night times (where applicable) at each location; and
  - 2.2 measurement locations, and the number thereof, must be specified, with one location established as a control location (noise).
- 3 Measurements and data recorded during the survey must include:
  - 3.1 operational status of noise producing equipment and throughput of the activity;
  - 3.2 subjective descriptions of the sound at each location;
  - 3.3 details of meteorological conditions relevant to the propagation of noise;
  - 3.4 the equivalent continuous ( $L_{eq}$ ) and  $L_{max}$ ,  $L_1$ ,  $L_{10}$ ,  $L_{50}$ ,  $L_{90}$ ,  $L_{99}$  and  $L_{min}$  A-weighted sound pressure levels measured over a period of 10 minutes or an alternative time interval approved by the Director;
  - 3.5 a data set containing periods capturing normal and worst operating conditions;
  - 3.6 A-weighted and C-weighted one-third octave spectra (including low frequency) over suitably representative periods of not less than 1 minute presented in tabulated and graph format; and
  - 3.7 narrow-band spectra over suitably representative periods of not less than 1 minute.

- 4 A noise survey report must be forwarded to the Director within 30 days from the date on which the noise survey is completed.
- 5 The noise survey report must include the following:
  - 5.1 the results and interpretation of the measurements required by these conditions;
  - 5.2 a map of the area surrounding the activity with the boundary of the Activity Area, measurement locations, and noise sensitive premises clearly marked on the map;
  - 5.3 any other information that will assist with interpreting the results and whether the activity is in compliance with these conditions and EMPCA; and
  - 5.4 recommendations of appropriate mitigation measures to manage any noise problems identified by the noise survey.

## **Operations**

### **OP1 Disinfection plan**

- 1 Unless otherwise approved in writing by the Director, the activity must operate in accordance with the approved *Wastewater Disinfection Plan* dated 2012, as amended or replaced from time to time with written approval of the Director.
- 2 Where required by the Director, the Disinfection Plan must be revised within the timeframe specified in writing by the Director.

### **OP2 Use of the Wastewater Treatment Plant Heating System**

- 1 Unless otherwise approved in writing by the Director, the Wastewater Treatment Plant heating system associated with the bioreactor must:
  - 1.1 only be used on days when the temperature in the bioreactor falls below 13° Celsius; and
  - 1.2 utilise no more than 40 kilolitres of water per day.
- 2 Records of the operation of the heating system must be maintained for at least three years. The records must include, but not necessarily limited to:
  - 2.1 the temperature of the bioreactor when the water is added; and
  - 2.2 the volume of water added per day to the bioreactor.

## **Waste Management**

### **WM1 Receiving of blood water**

- 1 Unless otherwise approved in writing by the Director, blood water from the harvesting of finfish can be received, stored and/or treated on the Activity Area.
- 2 Blood water received on the Activity Area must not be stored for a period of longer than five (5) days, except when used to support biological functions within the Wastewater Treatment Plant during process shutdowns.

### **WM2 Fish waste management**

- 1 Fish waste generated on the Activity Area, other than discarded whole fish, must be:
  - 1.1 kept in leak proof, lidded containers of strong construction, which must be kept closed when putrescible waste is being held in them, to the extent practical and reasonable. Any container to be kept outdoors must be fitted with a weather proof and animal resistant cover;
  - 1.2 moved to a refrigerated area as soon as reasonable and practical, but within 8 hours of generation of the waste at the latest; and
  - 1.3 removed from the Activity Area within 24 hours.
- 2 Discarded whole fish must:

- 2.1 be kept within a refrigerated area within the fish processing factory; and
- 2.2 must be removed from the Activity Area within 5 days of the first whole fish being discarded.

**WM3 Wastewater treatment plant solids management plan**

- 1 Unless otherwise approved in writing by the Director, the activity must operate in accordance with the *Wastewater Treatment Plant Solids Management Plan* dated October 2023, and as amended or replaced with written approval of the Director.
- 2 Where reasonably required by the Director, the Wastewater Treatment Plant Solids Management Plan must be revised within the timeframe specified in writing by the Director.

## Schedule 3: Information

### Legal Obligations

#### **LO1 EMPCA**

The activity must be conducted in accordance with both the conditions in this document and the obligations of the *Environmental Management and Pollution Control Act 1994* (EMPCA) and subordinate regulations. The conditions of this document do not replicate legislated obligations; therefore, you should ensure you are aware of your obligations under EMPCA and subordinate regulations.

#### **LO2 Biosecurity Act 2019**

The activity must be undertaken in accordance with the Biosecurity Act 2019, as the activity may pose a biosecurity risk.

### Other Information

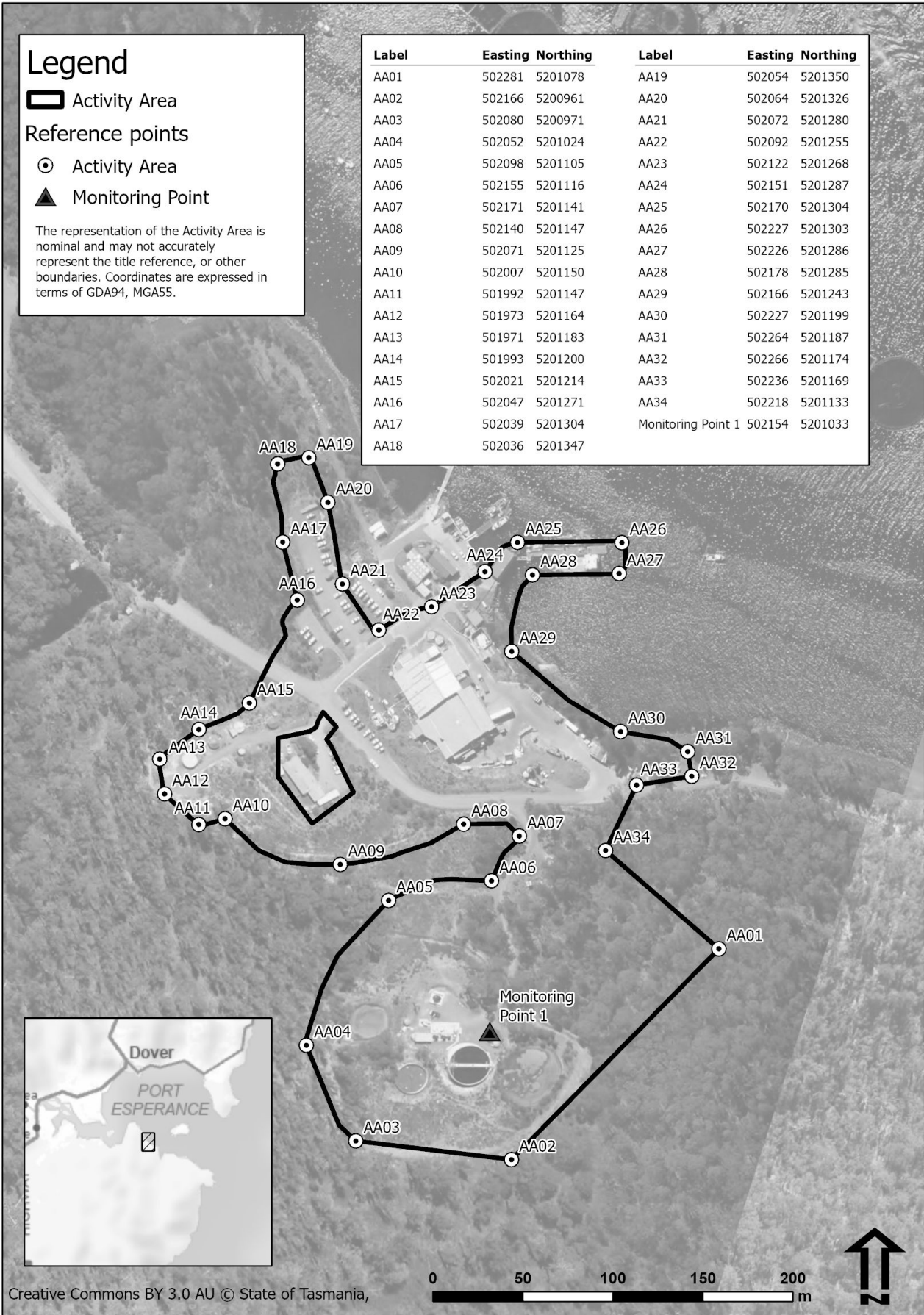
#### **OI1 Notification of incidents under section 32 of EMPCA**

Where a person is required by section 32 of EMPCA to notify the Director of the release of a pollutant, the Director can be notified by telephoning **1800 005 171** (a 24-hour emergency telephone number).

#### **OI2 Release of Relevant Information**

Under the provisions of section 23AA of EMPCA relevant information relating to monitoring of environmental impacts required under these conditions may be subject to publishing or public release by the Director.

# Attachment 1: Activity Area







ENVIRONMENT PROTECTION AUTHORITY