

**WASTE MANAGEMENT PLAN
FOR
WINTERGREEN FRAM
3329 OXLEY HIGHWAY SOMERTON NSW 2340**

Prepared for: Wintergreen Farm
Department of Planning, Housing and Infrastructure
Department of Primary Industries and Regional Development
NSW EPA
Tamworth Regional Council

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1. INTRODUCTION

Benbow Environmental has been engaged by Wintergreen Farm to prepare a Waste Management Plan for the proposed poultry farm expansion located at 3329 Oxley Highway Somerton NSW 2340 (legally designated as Lot 10/DP261839). Currently, the site accommodates 240,000 birds. The proposed development is seeking to expand operations accommodate 810,510 birds within a total of 14 sheds.

This report is appended to an Environmental Impact Statement (EIS), which addresses environmental considerations identified in the Secretary's Environmental Assessment Requirements (SEARs).

The purpose of this Waste Management Plan (WMP) is to provide guidance to ensure that general and hazardous waste is managed at site in a way that is protective of health, safety and the environment.

Waste management at the site would be undertaken in line with the waste hierarchy demonstrated in the following diagram:





1.1 SCOPE

The Secretary's Environmental Assessment Requirements (SEARs) 1982 was issued on 8th April 2025. Relevant requirements of waste management from different authorities are provided in Table 1-1:

Table 1-2: SEARs Requirements

Requirements	Comment
Department of Planning, Housing and Infrastructure	
Details of waste handling including transport, identification, receipt, stockpiling and quality control including off-site reuse and disposal	Section 4.4
Detail of waste management including manure and disposal of dead poultry for the proposal	Section 4 Section 4.4.1 Section 4.4.3
The measures that would be implemented to ensure that the proposed development is consistent with the aims, objectives and guidelines in the <i>NSW Waste Avoidance and Sustainable Materials Strategy 2041</i>	Section 4.7
Environment Protection Authority	
consideration needs to be given to disposal options for general waste and solid waste litter from the poultry sheds;	Section 4.4.4
management of mortalities under normal operating conditions and in the event of a mass death scenario, to prevent odour emissions, contain pathogens, control vermin and disease vectors, and protect surface water and groundwater from pollution;	Section 4.4.3 Section 4.5 Section 4.6
Identify and quantify waste streams associated with the proposal, including general solid waste, bird mortalities and litter waste generated as part of the operation of the poultry sheds, and the associated management arrangements.	Section 4

The purpose of this plan is to provide an overview of the waste management processes to be undertaken for the proposed activities.

The scope of this WMP is limited to the following objectives:

- Provide a description of the proposed activities;
- Compliance with legislation and policies that may apply to the development.
- Formalise waste handling, transfer and disposal activities associated with waste from the depot;
- To prevent inappropriate management of waste and associated risk of pollution of the environment;



- To facilitate waste minimisation entailing avoidance, reduction, reuse, recycling or treatment before disposal;
- To streamline waste segregation, storage, and disposal and promote resource recovery from waste;
- To contain, control and dispose of waste in accordance with the required waste management practices (e.g. waste segregation);
- To define responsibility for waste management at the various levels of operation associated with the maintenance activities;
- To provide a framework for the selection of waste management service providers in line with cradle to grave principles.



2. PROPOSED DEVELOPMENT

The existing site accommodates 240,000 birds. The proposed development is seeking to expand operations to accommodate 810,510 birds within a total of 14 sheds.

The existing sheds have an internal floor area of 2,323 m² and the proposed sheds will have an internal floor area of 2,970 m².

The stocking density of approximately 34 kg per square metre will apply to all 14 sheds. This corresponds to a maximum capacity of 49,945 birds for the existing sheds and 63,855 birds for the proposed sheds.

Details of the waste processes are listed below. As there are different waste streams, these have been broken up into separate lists.

2.1 PROPOSED SITE OPERATIONAL DETAILS

Each shed would go through a 9 -10-week production cycle, consisting of approximately 7-8 weeks of growing phase and 2 weeks of break in-between growing phases. Typically, birds are collected for harvesting during the 5th, 7th and last (7th or 8th) week in the growth cycle. The RSPCA require a stocking density of no more than 34 kg per sqm, and the birds are weighed towards the last weeks of the growing phase to ensure thin outs occur such that the RSPCA stocking density is not exceeded.

In the 2-week break period, at the end of every growing phase, a full shed clean out is undertaken and usually completed in 2 days. The clean out involves the mechanical removal of all spent litter from the sheds and its immediate disposal: the litter is collected by contractors, loaded directly onto trucks and transported off site for further processing elsewhere (usually used as a valuable by-product for other forms of agricultural activities). Shed clean out will be immediately followed by disinfection.

Wood shavings and straw would be most commonly used as litter material. Nipple drinkers fitted with catch-cups are used to supply drinking water to the birds, while pneumatically controlled pipelines deliver chicken feed from hoppers.

2.2 WASTE STREAMS & TYPES

Waste streams and types are defined under the NSW EPA *Waste Levy Guidelines* (2018).

The wastes that generate from poultry farms are separate to 2 types that include:

- solid waste
- wastewater

Solid waste is bedding material, litter, manure, feather, dead birds, while the wastewater comes from washing and disinfection of chicken pens.

Primary waste stream is provided in Table 2-1.



Table 2-2: Waste types

Waste Type	Code
Poultry litter (Bedding materials) Sewage (From treatment)	BIO
Batteries	BATT
Clinical Waste	PHARM
Light bulbs Chemical and fuel containers	PROB
Routine / daily dead birds Mass bird mortalities*	VET
General Waste	MIX
Used motor oil, air and oil filters and rags	OIL
Green waste	VEG

*This type of waste is not part of the site's regular operations.

2.2.1 Destinations for Waste Streams

General waste, including construction debris, domestic waste will be collected in designated containers and disposed of at a registered landfill site. Chicken manure will be sent to off-site facility to be used as a fertiliser on rural properties. The majority of water from the wash process evaporates due to the minimal volume used; however, any remaining runoff is captured and directed into a dedicated water storage dam. Sewage will continue to be collected in on-site septic tank as well, which will be pumped and transported by a registered contractor to an approved disposal facility. Hazardous waste, such as used oil, diesel, and petroleum-based fluids, will be stored separately in sealed containers and disposed of at a registered hazardous treatment facility. There is minimal medical waste generated on site, as all vaccinations and medications are administered through the broilers' drinking water. Medical waste is therefore limited mainly to empty medicine containers. By implementing these disposal measures, the farm will ensure compliance with regulatory requirements while minimizing environmental impact.

2.3 EMPLOYMENT

The proposal is expected to provide employment for 48 employees during construction, 7 full-time employees during operations, and to generate employment for trucking contractors (feed delivery, bird pickup, manure merchants, wash and sanitizing crews, bedding providers, bedding spreaders, electricians, plumbers and repairs and maintenance teams).

2.4 HOURS OF OPERATION

The existing farm currently operates 24/7. Feed deliveries occur during daytime hours and bird pickup typically occurs during night-time hours for the comfort of the birds.



3. LEGAL AND OTHER REQUIREMENTS

The relevant legislation and guidelines that have been addressed in relation to waste management are:

- *Waste Classification Guidelines – Part 1: Classification of waste* (NSW EPA, 2014);
- *Protection of the Environment Operations Act 1997*;
- *Protection of the Environment Operations (Waste) Regulation 2014*;
- *Waste Avoidance and Resource Recovery Act 2001*; and
- *Integrated Waste Management and Resource Recovery Strategy 2017*
- *NSW Waste and Sustainable Materials Strategy 2041*

The relevance of each piece of legislation and guideline is described in the following sections.

3.1 WASTE CLASSIFICATION GUIDELINES

In the NSW EPA *Waste Classification Guidelines* (2014), “waste” is described as:

- a) any substance whether solid, liquid or gaseous that is discharged, emitted or deposited in the environment in such volume, constituency or manner as to cause an alteration in the environment; or*
- b) any discarded, rejected, unwanted, surplus or abandoned substance; or*
- c) any otherwise discarded, rejected, unwanted, surplus or abandoned substance intended for sale or for recycling, reprocessing, recovery or purification.*

All waste materials generated during operation must be classified into one of six different categories described in the *Waste Classification Guidelines* (see Table 3-1). Classification of waste enables the owner/generator to determine the appropriate handling, transport and, if necessary, disposal requirements.

Table 3-1: *Waste Classification Guidelines* Waste Classes

Class	Definitions/Examples
Special waste	<ul style="list-style-type: none"> • Clinical and related wastes; • Asbestos waste; • Waste tyres.
Liquid waste	<ul style="list-style-type: none"> • Waste that has an angle of repose <5 degrees; • Waste that becomes free flowing at or below 60°C. • Is not generally capable of being picked up by a spade or shovel.
Hazardous waste	<ul style="list-style-type: none"> • Waste with a pH ≤2 or ≥12.5; • Containers that have not been cleaned and contained dangerous goods within the meaning of the Transport of Dangerous Goods Code; • Lead-acid or nickel-cadmium batteries.
Restricted solid waste	<ul style="list-style-type: none"> • This type of waste is determined by chemical tests.

Table 3-1: *Waste Classification Guidelines* Waste Classes

Class	Definitions/Examples
General solid waste (putrescible)	<ul style="list-style-type: none"> • Waste from litter bins collected by local councils; • Manure and night soil; • Food waste; • Animal waste; • Grit or screenings from sewage treatment systems that have been dewatered so that the grit of screenings do not contain free liquids.
General solid waste (non-putrescible)	<ul style="list-style-type: none"> • Glass, plastic, rubber, plasterboard, ceramic, bricks, concrete or metal; • Paper or cardboard; • Garden waste • Grit, sediment, litter and gross pollutants collected in, and removed from, stormwater treatment devices and/or stormwater management systems, that has been dewatered so that they do not contain free liquids; • Garden waste; • Wood waste; • Virgin excavated natural material.

office and amenities waste falls under general solid waste (non-putrescible). Grease, oil, wastewater and the like fall under liquid waste. Grit/solids filtered from the wastewater/sewage stream will be classed as general solid waste (putrescible). Clinical/medical waste falls under special waste. Bedding materials as well as dead birds will be under General solid waste (putrescible).

3.2 PROTECTION OF THE ENVIRONMENT OPERATIONS ACT, 1997

The *Protection of the Environment Operations Act 1997* (POEO Act) is the principal environmental protection legislation for NSW. It defines 'waste' for regulatory purposes and establishes management and licensing requirements for waste. It defines offences relating to waste and sets penalties.

Part 1 in Schedule 1 of the *Protection of the Environment Operations Act 1997* (POEO Act) lists premise-based activities that are scheduled activities and, as such, that require a licence under the Act. The proposed development incorporates the scheduled activities as defined by clause 22, and therefore, requires an EPL.

The site will exceed the threshold quantity in the clause table of bird accommodation capacity to accommodate more than 250,000 birds at any one time.

The POEO Act also establishes the ability to set various waste management requirements via the Protection of the Environment Operations (Waste) Regulation 2014, discussed below.



3.3 PROTECTION OF THE ENVIRONMENT OPERATIONS (WASTE) REGULATION 2014

The *Protection of the Environment Operations (Waste) Regulation 2014* (Waste Regulation) identifies provisions relating to waste management and disposal.

Part 3, Clause 28 of the Waste Regulation states:

28 Waste and other materials transported from facility for use, recovery, recycling, processing or disposal

The occupier of a scheduled waste facility must record the following information in relation to each load of waste or other material transported from the facility for use, recovery, recycling, processing or disposal at another place

- (a) the amount of any waste contained in the load, its waste type and (except where the waste is trackable liquid waste) its waste stream,*
- (b) the amount of any other material contained in the load and a description of the nature of that other material,*
- (c) the amount of any waste contained in the load that is spoil generated by dredging activities,*
- (d) if any of the waste in the load has been collected in accordance with a community service or activity, or arising from a biological outbreak or natural disaster, and been approved by the EPA for the purposes of clause 21*
 - (i) the date of the approval and the code or number allocated by the EPA for the approval, and*
 - (ii) the amount of that waste, and*
 - (iii) particulars of the community service or activity, biological outbreak or natural disaster in respect of which the waste has been collected,*
- (d1) the amount of any waste contained in the load that is wholly or predominantly comprised of whale carcasses,*
- (e) the date and time the load is transported from the facility,*
- (f) the registration number of the vehicle used to transport the load,*
- (g) the name and address of the place to which the load is transported and the code or number of any environment protection licence for that place,*
- (h) in the case of waste or other material in the load that is removed from a stockpile required to have a unique identification number under clause 31(1)(a)—the unique identification number,*
- (i) in the case of an occupier who is required to pay contributions under section 88 of the Act—details of any recycling, mixing, blending or processing of any waste in the load, including the composition as a proportion of waste and other material in any waste-derived material in the load.*

The proposed development would keep records of details of outgoing waste. Implementation of the procedure in Section 5 of this WMP would ensure record keeping requirements under this Part are met.



3.4 WASTE AVOIDANCE AND RESOURCE RECOVERY ACT 2001

The *Waste Avoidance and Resource Recovery Act 2001* (WARR Act) promotes waste avoidance and resource recovery to achieve a continual reduction in waste generation. Among other miscellaneous provisions, the WARR Act sets out provisions for waste strategies and programs, and industry actions for waste reduction.

Waste minimisation and resource recovery would be practised as part of the main goals of the facility. Resource recovery practices implemented at the site are in accordance with the *NSW Waste and Sustainable Materials Strategy 2041 – Stage 1: 2021-2027*, which “focuses on the environmental benefits and economic opportunities in how we manage our waste.”

The company would also follow the NSW EPA hierarchy of waste management for the management of wastes generated as a result of its ongoing operations.

3.4.1 Waste and Sustainable Materials Strategy 2041 Stage 1: 2021-2027

The proposed development will continue to support and remain consistent with a number of statutory policies including the “Waste Avoidance and Resource Recovery Act, 2001” (WARR Act) and the “NSW Waste and Sustainable Materials Strategy 2041 – Stage 1: 2021-2027”. This strategy is a key policy tool under the WARR Act.

The proposed development will allow for resourceful reuse of materials offsite with the primary materials obtained. In line with the Strategy’s most relevant targets, the site will:

- reduce total waste generated by 10% per person by 2030

Comment: This will be achieved through measures such as optimizing resource use, improving waste segregation and recycling, reducing packaging, and enhancing operational efficiency. Staff will be trained to support these initiatives.

- Phase out unnecessary and problematic plastics by 2025

Comment: This development promotes the reuse of plastics, allowing for an easier transition.

Waste minimisation and resource recovery would be practised as part of the company’s commitment to the principles of Ecologically Sustainable Development (ESD) and the Waste Avoidance and Resource Recovery Act. Wintergreen Farm is committed to the reuse of materials in order to improve the economic efficiency of the process and the principles of the ESD.

3.5 INTEGRATED WASTE MANAGEMENT AND RESOURCE RECOVERY STRATEGY 2017

This Integrated Waste Management and Resource Recovery Strategy has been developed during a period of substantial development of state and regional waste policy over the last four years. This consultation document sets out Tamworth Regional Council’s ambitions for sustainable waste management incorporating increased resource recovery or recycling. The proposed development adheres to *Tamworth Regional Council’s Integrated Waste Management and Resource Recovery Strategy*, aligning with its themes, objectives, and aims, which form the basis of the Council’s strategic intent for sustainable waste management and environmental responsibility.

4. WASTE CLASSIFICATION & MANAGEMENT

4.1 WASTE CLASSIFICATION

The POEO Act (1997) describes waste as:

- a) *any substance whether solid, liquid or gaseous that is discharged, emitted or deposited in the environment in such volume, constituency or manner as to cause an alteration in the environment; or*
 - b) *any discarded, rejected, unwanted, surplus or abandoned substance; or*
 - c) *any otherwise discarded, rejected, unwanted, surplus or abandoned substance intended for sale or for recycling, reprocessing, recovery or purification by a separate operation from that which produced the substance, or*
 - d) *any processed, recycled, re-used or recovered substance produced wholly or partly from waste that is applied to land, or used as fuel, but only in the circumstances prescribed by the regulations, or*
 - e) *any substance prescribed by the regulations to be waste.*
- A substance is not precluded from being waste for the purposes of this Act merely because it is or may be processed, recycled, re-used or recovered.*

All waste materials generated or received on the subject site must be classified into one of six (6) different categories described in the *Waste Classification Guidelines* (Table 4-1).

Table 4-1: Classes of Waste from Waste Classification Guidelines (NSW EPA, 2014)

Class	Definitions / Examples
Special waste	<ul style="list-style-type: none"> Clinical and related wastes; Asbestos waste; Waste tyres.
Liquid waste	<ul style="list-style-type: none"> Waste that has an angle of repose <5 degrees; Waste that becomes free flowing at or below 60°C; Is not generally capable of being picked up by a spade or shovel.
Hazardous waste	<ul style="list-style-type: none"> Waste with a pH ≤2 or ≥12.5; Containers that have not been cleaned and contained dangerous goods within the meaning of the Transport of Dangerous Goods Code;
Restricted solid waste	<ul style="list-style-type: none"> This type of waste is determined by chemical tests.
General solid waste (putrescible)	<ul style="list-style-type: none"> Waste from litter bins collected by local councils; Food waste; Grit or screenings from sewage treatment systems that have been dewatered so that the grit of screenings do not contain free liquids.

Table 4-1: Classes of Waste from Waste Classification Guidelines (NSW EPA, 2014)

Class	Definitions / Examples
General solid waste (non-putrescible)	<ul style="list-style-type: none"> • Paper or cardboard; • Glass, plastic, rubber, plasterboard, ceramic, bricks, concrete or metal; • Grit, sediment, litter and gross pollutants collected in, and removed from, stormwater treatment devices and/or stormwater management systems, that has been dewatered so that they do not contain free liquids

Office and amenities waste falls under general solid waste (non-putrescible). Grease, oil, wastewater and the like fall under liquid waste. Grit/solids filtered from the wastewater/sewage stream will be classed as general solid waste (putrescible). Clinical/medical waste falls under special waste. Bedding materials as well as dead birds will be under General solid waste (putrescible).

4.2 OPERATIONAL WASTE

The following broad waste streams are anticipated from the operation of each of the shed in the proposed development:

- General Non-Recyclable Waste
- Recyclable Waste
- Chemical Containers
- Sewage
- Birds litter
- Routine Mortality Dead Birds
- Tyres
- Food and organic waste
- Used motor oil, air and oil filters and rags
- Batteries.

Table 4-2 shows waste streams, NSW EPA classification, estimated quantity and management methods.



Table 4-3: Waste Management – Operational Waste

Waste Type		Estimated Quantities Per 8 Weeks Cycle (Tonnes)	Tonnes per year	EPA Waste Classification ¹	Relevant Resource Recovery Order	Management
General waste	Cardboard and bulky cardboard boxes	0.03	0.2	General solid waste (non-putrescible)	-	Collected in bulk bins and removed by contractor
	Dead birds	31.35	200	General solid waste (putrescible)	-	Stored in sealed freezer and collected daily by contractor
	Poultry Litter	1393.2	8360	General solid waste (putrescible)	The manure order 2014	Removed after each batch, transported off-site as fertiliser
	Recyclable containers including glass and plastic bottles, aluminium cans and steel cans	0.07	0.4	General solid waste (non-putrescible)	-	Collected in recycling bins, contractor disposal
	Food waste	0.04	0.3	General solid waste (putrescible)	-	Placed in bins, regular contractor pickup
	Air-conditioning parts and filters	0	0	General solid (non-putrescible) waste	-	Replaced as needed during maintenance and disposed via general waste or recycled if possible.
	Recycle Plastic Drinkers/ Feeders	0.04	0.2	General solid (non-putrescible) waste	-	Sent for recycling
	Total	1424.73	8,561			
Medical waste	Any materials used for the vaccination/quarantine of chickens	0.1	0.6	Special waste	-	Stored in labelled bins and collected by licensed contractor
	Total	0.1	0.6			



Waste water	Wash water from washing the chicken houses	40	240	Liquid waste	-	Due to the small amount of water used, most of it evaporates; however, any remaining runoff is directed into a dedicated water storage dam.
	Sewage (from staff amenities and residences)	1	6	Liquid waste	The biosolids order 2014	Pumped out by licensed contractor
	Total	41	246			
Chemicals	Oil and Diesel	0.05	0.3	Hazardous waste if containers used to store Dangerous Goods (Class 1, 3, 4, 5 or 8) and residues have not been removed by washing or vacuuming. General solid (non-putrescible) waste if containers cleaned by washing or vacuuming.	-	Stored and removed by licensed contractor
	Fuel container	0.02	0.1		-	Disposed by contractor or via DrumMUSTER
	Cleaning chemicals	0.06	0.4		-	Stored in bunded area; removed by contractor
	Total	0.13	0.8			
Hazardous waste	Light bulbs and fluorescent tubes	0.02	0.1	Hazardous waste	-	Stored and removed by licensed contractor
	Batteries	0	0.0	Hazardous waste	-	Stored securely and disposed as required
	Printer toners and ink cartridges	0	0.0	Hazardous waste	-	Recycled or sent to designated facility
	Total	0.02	0.1			



Special waste	Tyres	0.05	0.3	Special waste	The recovered tyres order 2014	Stored and removed by tyre recycling contractor
	All waste total	1466.03	8809			



4.3 CONSTRUCTION AND DEMOLITION WASTE

No demolition is required. Construction works would involve constructing additional sheds which will be included but not limited to site preparation and earthworks, steel framework erection, ventilation and cooling system integration and lighting installations. Additional infrastructure includes administration offices, storage buildings, quarantine areas and driveways.

Table 4-4: Expected Construction Waste

Waste Type	Estimated Maximum Quantity (tonnes)	EPA Waste Classification ¹	Management
Concrete	150	General solid waste (non-putrescible)	Placed in designated skip bin to be removed from site by a recycling contractor.
Excavation materials	400	General solid waste (non-putrescible)	These are cut and fill works. They will be deposited as necessary to level the site.
Metals	30	General solid waste (non-putrescible)	Placed in designated skip bin to be removed from site by a recycling contractor.
Timber	50	General solid waste (non-putrescible)	Placed in designated skip bin to be removed from site by a recycling contractor.

Note: ¹ Waste classification according to Waste Classification Guidelines provided.



4.4 HANDLING AND DISPOSAL OF WASTE

4.4.1 Poultry Litter

To minimise the risk of disease spread amongst flocks and likelihood of offensive odours emitted from the proposed facility, spent litter and manure will be removed from the sheds at the end of each batch. This is followed by washing and disinfecting before placing the next batch of chickens.

Spent litter will be trucked promptly off-site to be used as a fertiliser on rural properties. Apart from a small amount of spent litter to be used for composting, waste litter and manure would not be stockpiled to reduce odour impacts and biosecurity risks. The use of spent litter (manure and spent bedding) for land application is permitted by The Manure Exemption (2014), under Part 9, Clauses 91 and 92 of the *Protection of the Environment Operations* [POEO] (Waste) Regulation 2014. Poultry litter will be transported with enclosed vehicles in accordance with *Regulation 292 of Road Rules Regulation (2014)* to prevent any spillage and emissions. Re-use of spent litter as a fertiliser and composting medium is consistent with the WARR Strategy.

It is expected that at the end of each eight-week production cycle, a typical poultry shed at the Wintergreen farm will have accumulated approximately 1393.2 tonnes of poultry waste.

Immediately after the last bird is collected for processing and the shed is empty, litter is pushed up in a pile at the front of the shed and then loaded onto trucks and removed from the premises by contractors. The manure is presold to farmers within the region who spread it on their paddocks. Within 24 hours of the shed being empty of any livestock, the manure is taken off site.

The safe handling and application of the material once it has left the development site will be the responsibility of the end-user. The proponent will direct end users to the management guidelines provided in the National Environmental Management System for the Meat Chicken Industry (RIRDC 2014). Records of the quantity, transporter, destination and intended use will be maintained on-site.

4.4.2 Chemical

Chemicals used at the Wintergreen Farm will be primarily applied for sanitisation and disinfection. These chemicals would be brought to the site and removed by contracted shed cleaners at the end of each farm cycle. Any empty chemical containers generated by shed cleaning would be removed from the site and appropriately disposed of by the respective cleaning company. The proponent would be responsible for waste generated by chemicals stored on-site.

The following chemicals would be stored on-site for water sanitation, as well as pest, vermin and weed control:

- BIOSOLVE HDD
- VIRKON S
- LarvaBETA
- RoundUp
- SureFire Block Baits

The above chemicals will be stored in an appropriately bunded area in lockable chemical shed for short terms and in limited volumes. All stored chemicals will be placarded if quantities exceed WorkCover placarding requirements. In the unlikely event that the quantities of chemicals stored



exceed dangerous goods notification thresholds, WorkCover will be notified and standard Dangerous Goods handling processes followed.

Empty chemical containers will be disposed of either by a chemical supply company or the DrumMUSTER program. Using either waste depositary system, empty drums would be disposed of as per manufacturer's instruction.

The potential risks associated with the management of chemical wastes at the proposed facility are considered low, based on the use of best management practices, the limited volumes of chemicals stored, as well as the locations and design of chemical storage sheds. Risks will be further reduced through the preparation and implementation of an environmental operations manual prior to operations commencement, which will detail requisite mitigation measures, including incident management procedures and waste disposal protocols. Safety Data Sheets (SDS) for all chemicals kept on-site would be available for reference by staff at all times. Procedures for dealing with spills of chemical waste will follow chemical SDS protocols and detailed within the environmental operations manual for the facility. The proposed facility also, will store diesel, unleaded petrol and LPG. These chemicals will be stored in steel tank on site with appropriate bunding to prevent leaks or spills from impacting the surrounding environment. The storage area will be located on an impervious hardstand surface, away from stormwater drains, and will be clearly signposted with safety and hazard information.

Waste oil and diesel will be removed by contractors from site.

Due to the minimal quantity of waste generated from operations, primarily consisting of medicine and chemical containers, a dedicated waste storage room is not required. All chemical and clinical containers waste will be stored in designated enclosed outdoor area, ensuring appropriate containment and management in accordance with regulatory requirements.

4.4.3 Dead Birds

Based on provided information from the client, mortality rate in existing sheds is 1.25% weekly. It is assumed this will be remained for the proposed sheds which means the number of dead birds would be 89 per day. Daily bird mortalities will be collected at least once a day from each shed and will be stored in a fully sealed 20-foot freezer container. These will be picked up in a covered waste vehicle and taken to Ron Jones Haulage, a Baiada contractor daily. This way, there is no potential for decomposition of the carcasses to risk odour emissions. If greater than expected mortalities occur, more frequent collection will be facilitated. A contingency plan is in place for managing mass bird deaths in line with biosecurity protocols and is provided in section 4.7.

4.4.4 General Waste

The proposed development will utilise 4 m³ bulk bins and 240 L wheelie bins for the collection and disposal of general waste, along with separate 240 L bins dedicated to recyclables. Bin numbers and collection frequency will be scaled to meet the operational demands of the site, ensuring waste is managed efficiently and in compliance with relevant regulations. The waste from the dwellings is handled in the same way and emptied into the skip bin when required. A waste contractor empties the industrial bin on a weekly basis, or more regularly if needed. Waste bins stored externally are to have lids closed and these are to be kept closed when not in use to prevent waste from being blown out of the bins, causing littering and the potential to enter the storm water system. If the industrial bin is full prior to collection day, then extra collections will be organised by



the farm management. Recyclable waste such as paper, cardboard and plastic will be put into the recycling bin near the amenities area. Recycling pick-up or drop off will be investigated for local services in the first instance.

4.4.5 Wastewater

4.4.5.1 Sewage

Sewage generated by on-site staff amenities at the Wintergreen Farm will be connected to septic system and collected via a pump-out system by a licensed contractor on a regular basis. This sewage waste would be disposed off-site by the contractor in accordance with relevant standard, guidelines and control approvals if a pump out is installed otherwise waste will be disposed by the usual onsite transpiration arrangements.

Shed floors are washed down using low-volume, high-pressure water that is kept within the shed confines. Due to the low volume of water used, any water remaining on the shed pad is evaporated by the ventilation system.

4.4.5.2 Vehicle Wash Down

These are in the form of wheel washes. The runoff is captured in the sump and generally evaporates as it generates such small quantities.

4.5 BULKY OR HAZARDOUS WASTE MANAGEMENT

Sufficient space will be provided at the Development for the storage of large and/or bulky items and hazardous wastes that cannot be disposed of in the general waste or recyclable streams. This would include furniture, shelving, e-waste, batteries, fluorescent lights and smoke detectors.

Site operators may consider organising a separate occasional collection as required to remove bulky waste items or engaging a contractor to collect and transport these items for reuse, recycling or disposal.

The only chemicals expected to be used at the Development will be for cleaning and disinfection purposes. Empty chemical containers will be returned to the local supply company for reuse, recycling or appropriate disposal. Alternatively, a licensed contractor will be engaged to provide a chemical container pickup service for recycling, reuse or appropriate disposal.

4.6 CONTINGENCY OPERATIONS FOR MASS BIRD DEATHS

In the event of a notifiable disease outbreak requiring the depopulation of birds, such as Highly Pathogenic Avian Influenza (HPAI) or Newcastle Disease, the proponent has developed a contingency plan to manage the mass disposal of poultry in accordance with national and state biosecurity standards.

The following measures will be implemented to ensure effective, safe, and environmentally responsible disposal of affected livestock:



4.6.1 Emergency Response Coordination

In the event of a disease outbreak:

The proponent will immediately notify the NSW Department of Primary Industries and Regional Development (DPIRD) (formerly DPI), Local Land Services (LLS), and other relevant authorities.

The farm will implement the relevant procedures outlined in:

- AUSVETPLAN Carcass Disposal Manual (Edition 3, Animal Health Australia, 2015)
- NSW DPI Emergency Animal Disease Response Plan (EADRP)
- Emergency Animal Disease Response Agreement (EADRA)

These documents form the basis for coordinated national response to emergency animal disease incidents.

4.6.2 Quarantine and Depopulation

The affected sheds or the entire farm, if required, will be placed under quarantine.

Depopulation of birds will be undertaken in a humane and bio-secure manner, consistent with RSPCA and Model Code of Practice for the Welfare of Animals – Domestic Poultry standards.

Personnel will be equipped with appropriate personal protective equipment (PPE) and follow strict decontamination procedures to prevent disease spread.

4.6.3 Disposal Methodology

The preferred disposal methods, selected based on environmental suitability, volume, and biosecurity risk, include:

- On-Site Deep Burial (subject to approval by NSW EPA and geotechnical assessment) Burial pits will be constructed in line with the NSW EPA Guidelines for the On-Site Burial of Animals.
 - ▶ Sites will be located away from watercourses, flood-prone areas, and bores.
 - ▶ Liner and cover material will be used to prevent leachate migration and scavenger access.
- On-Site Composting
 - ▶ Where feasible, whole-bird composting will be implemented using carbon sources such as straw or wood shavings.
 - ▶ The composting process will follow AUSVETPLAN procedures, ensuring temperature and aeration parameters are maintained to promote pathogen breakdown.
 - ▶ Compost piles will be monitored and managed by trained personnel to ensure compliance and efficacy.
- Off-Site Disposal (as a contingency)

In the event that on-site methods are not feasible, carcasses will be transported to an EPA-licensed rendering facility or landfill.

Transport will be undertaken in sealed, leak-proof vehicles in accordance with NSW Biosecurity Regulation 2017.



The dead bird freezer currently on site (-20°C, 3-day capacity) will be used to temporarily store mortalities pending collection.

4.6.4 Decontamination and Site Remediation

Following disposal:

- Sheds, equipment, and operational areas will be thoroughly cleaned and disinfected under DPIRD supervision.
- Contaminated litter and bedding will be disposed of through composting, burial, or licensed off-site disposal.
- The site will be subject to inspection and testing before restocking is permitted.

4.6.5 Recordkeeping and Reporting

Detailed records will be maintained during all stages of the outbreak response, including:

- Mortality counts
- Disposal volumes and methods
- Cleaning and decontamination procedures
- Personnel movements

These records will be provided to the NSW DPIRD and other regulatory bodies upon request.

4.6.6 Training and Preparedness

All farm staff are trained in biosecurity protocols and will receive refresher training on emergency disease response annually.

The contingency plan will be reviewed and updated regularly in consultation with local and state authorities.

The farm maintains contact with the Local Emergency Management Committee (LEMC) to ensure integration with regional emergency services if required.

4.7 WASTE AVOIDANCE, REUSE AND RECYCLING

4.7.1 Waste Avoidance

Waste avoidance measures may include:

- Participating in take-back services to suppliers to reduce waste further along the supply chain
- Avoiding printing where possible
- Providing ceramic cups, mugs, crockery and cutlery rather than disposable items
- Purchasing consumables in bulk to avoid unnecessary packaging
- Implementing biosecurity measures to better control potential disease risks
- Presenting all waste reduction initiatives to staff as part of their induction program, and
- Investigating leased office equipment and machinery rather than purchase and disposal.

4.7.2 Re-use

Possible re-use opportunities include:



- Establish systems with in-house and supply chain stakeholders to transport products in re-useable packaging where possible.

4.7.3 Recycling

Additional recycling opportunities include:

- Plastic stretch wrapping and general soft plastics collection with a baler for ease of recycling
- Flatten or bale cardboard to reduce number of bales or bin lifts required
- Paper recycling trays provided in office areas for scrap paper collection and recycling and
- Development of 'buy recycled' purchasing policy.

4.8 MONITORING & RECORDS

Monitoring is recommended to ensure waste and recycling management arrangements and provisions are functioning adequately and feasibly for the development. Monitoring of bins, chemical storage area, dams, sheds and freezer should be conducted by the building manager, at minimum:

- Weekly, in the first two months of operation to ensure the waste management system is sufficient for the operation;
- Weekly in each cycle, to ensure an accurate estimate of bird mortalities.
- Every 8 weeks, to ensure waste is being managed appropriately.

Any deficiencies identified in the waste management system, including, but not limited to, unexpected waste quantities, should be rectified by the building manager as soon as practicable.

Quantities of waste and recycling, including dockets and/or receipts associated with disposal of waste and recycling, should be recorded by the building manager to allow reviews of the waste management arrangements and provisions at the site. Records of waste disposal should also be available to regulatory authorities, for example, Council, NSW EPA and SafeWork NSW, upon request.

Each storage bin or area at the facility will need to have a unique identification number.

For all information recorded, the following would be needed in accordance with Part 3 of the Waste Regulation:

- Original records of information (such as paper documents) retained and accessible to EPA in their original form;
- All record-keeping systems are designed so that details of any adjustments are recorded against the adjusted record, including that the record has been amended and the extent of the change;
- All electronic records are backed up weekly and backups stored in a secure location;
- Quantity of waste is recorded to two decimal places;

- All electronic records are to be downloadable by the EPA in an .xls, .xlsx, .csv or .dbf format at any time.

4.8.1 Record of Outgoing waste Loads

The following details for outgoing waste need to be maintained:

- Date & time dispatched;
- Name of destination;
- Address of destination;
- Environment Protection Licence number of destination (if applicable);
- Estimated Weight/Volume of load to two decimal places;
- Storage bay ID number from which the material was removed;
- Vehicle registration number;
- Name of driver; and
- Contents of load e.g.: Waste type.

4.8.2 Records of Vehicles

The following details in relation to vehicles that enter the facility for a purpose related to the operation of the site need to be maintained:

- Date & time the vehicle enters the facility;
- Date & time the vehicle leaves the facility;
- Vehicle registration number;
- Purpose of entry; and
- Estimated Weight of the vehicle.

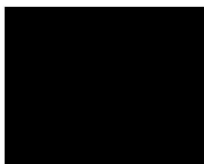
4.8.3 Complaints Hotline

The site would have erected at the entrance details of the complaints hotline and main contact.

4.8.4 Complaints Records

A record of any complaints lodged would be informed to the EPA under the requirements of the holder of an Environment Protection Licence.

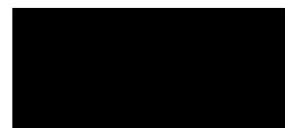
This concludes the report.



Environmental Scientist



Senior Engineer



Principal Consultant



5. LIMITATIONS

Our services for this project are carried out in accordance with our current professional standards for site assessment investigations. No guarantees are either expressed or implied.

This report has been prepared solely for the use of Wintergreen Farm, as per our agreement for providing environmental services. Only Wintergreen Farm is entitled to rely upon the findings in the report within the scope of work described in this report. Otherwise, no responsibility is accepted for the use of any part of the report by another in any other context or for any other purpose.

Although all due care has been taken in the preparation of this study, no warranty is given, nor liability accepted (except that otherwise required by law) in relation to any of the information contained within this document. We accept no responsibility for the accuracy of any data or information provided to us by Wintergreen Farm for the purposes of preparing this report.

Any opinions and judgements expressed herein, which are based on our understanding and interpretation of current regulatory standards, should not be construed as legal advice.