



Mr. Robert Read  
Read-Robertson Pty Ltd  
4 The Mews  
KARDINYA WA 6163

Dear Mr. Read

**ENVIRONMENTAL PROTECTION ACT 1986: LICENCE GRANTED**

**Premises**

Lot 9 on Plan 8322 Bowen Street  
O'Connor, WA, 6163  
**Licence Number:** 8776/2013/1

A licence under the *Environmental Protection Act 1986* (the Act) has been granted for the above premises. The Department of Environment Regulation will advertise the issuing of this licence in the public notices section of *The West Australian* newspaper.

The licence includes attached conditions. Under section 58(1) of the Act, it is an offence to contravene a condition of a licence. This offence carries a penalty of up to \$125,000 and a daily penalty of up to \$25,000.

In accordance with section 102(1)(c) of the Act, you have 21 days to appeal the conditions of the licence. Under section 102(3)(a) of the Act, any other person may also appeal the conditions of the licence. To lodge an appeal, contact the Office of the Appeals Convenor on 6467 5190 or by email at [admin@appealsconvenor.wa.gov.au](mailto:admin@appealsconvenor.wa.gov.au).

Where a licence is issued for more than one year it requires payment of an annual fee and will cease to have effect if the fee is unpaid. It is the occupier's responsibility to lodge a fee application and pay the annual fee in sufficient time to avoid incurring a late payment fee and for processing to be completed before the licence anniversary date.

If you have any queries regarding the above information, please contact Lauren Fox at the Swan Region on 9333 7531.

Yours sincerely

Peter Skitmore  
Officer delegated under section 20  
of the *Environmental Protection Act 1986*

3 October 2013





# Licence

## *Environmental Protection Act 1986, Part V*

**Licensee:** Read-Robertson Pty Ltd

**Licence:** L8776/2013/1

**Registered office:** 4 The Mews  
KARDINYA WA 6163

**ACN:** 082 948 730

**Premises address:** Marine Solutions WA  
13 Bowen Street  
O'CONNOR WA 6163  
Being Lot 9 on Plan 8322 as depicted in Schedule 1.

**Issue date:** Thursday, 3 October 2013

**Commencement date:** Thursday, 3 October 2013

**Expiry date:** Tuesday, 2 October 2018

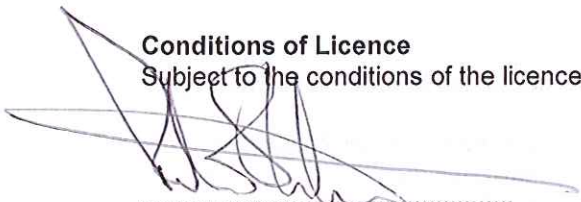
**Prescribed Premises Category**

Schedule 1 of the Environmental Protection Regulations 1987

Category number	Category description	Category production or design capacity	Premises production or design capacity
31	Chemical manufacturing: premises (other than premises within category 32) on which chemical products are manufactured by a chemical process.	100 tonnes or more per year	Not more than 2,000 tonnes per year

**Conditions of Licence**

Subject to the conditions of the licence set out in the attached pages.

  
.....  
Officer delegated under section 20  
of the *Environmental Protection Act 1986*





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## Introduction

This Introduction is not part of the Licence conditions.

### DER's industry licensing role

The Department of Environment Regulation (DER) is a Government Department for the State of Western Australia in the portfolio of the Minister for Environment. DER's purpose is to protect and conserve the State's environment on behalf of the people of Western Australia.

DER has responsibilities under Part V of the *Environmental Protection Act 1986* (the Act) for the licensing of prescribed premises. Through this process DER works with the business owners, community, consultants, industry and other representatives to prevent, control and abate pollution and environmental harm to conserve and protect the environment. DER also monitor and audit compliance with works approvals and licence conditions, take enforcement action as appropriate and develop and implement licensing and industry regulation policy.

### Licence requirements

This licence is issued under Part V of the Act. Conditions contained with the licence relate to the prevention, reduction or control of emissions and discharges to the environment and to the monitoring and reporting of them.

Where other statutory instruments impose obligations on the Premises/Licensee the intention is not to replicate them in the licence conditions. You should therefore ensure that you are aware of all your statutory obligations under the Act and any other statutory instrument. Legislation can be accessed through the State Law Publisher website using the following link:

<http://www.slp.wa.gov.au/legislation/statutes.nsf/default.html>

For your Premises relevant statutory instruments include but are not limited to obligations under the:

- Environmental Protection (Unauthorised Discharges) Regulations 2004 – these Regulations make it an offence to discharge certain materials such as contaminated stormwater into the environment other than in the circumstances set out in the Regulations.
- Environmental Protection (Controlled Waste) Regulations 2004 - these Regulations place obligations on you if you produce, accept, transport or dispose of controlled waste.
- Environmental Protection (Noise) Regulations 1997 – these Regulations require noise emissions from the Premises to comply with the assigned noise levels set out in the Regulations.



You must comply with your licence. Non-compliance with your licence is an offence and strict penalties exist for those who do not comply.

Licence holders are also reminded of the requirements of section 53 of the Act which places restrictions on making certain changes to prescribed premises unless the changes are in accordance with a works approval, licence, closure notice or environmental protection notice.

#### Licence fees

If you have a licence that is issued for more than one year, you are required to pay an annual licence fee prior to the anniversary date of issue of your licence. Non payment of annual licence fees will result in your licence ceasing to have effect meaning that it will no longer be valid and you will need to apply for a new licence for your Premises. Operating without a licence is an offence under the Act.

#### Ministerial conditions

If your Premises has been assessed under Part IV of the Act you may have had conditions imposed by the Minister for the Environment. You are required to comply with any conditions imposed by the Minister.

#### Premises description and Licence summary

Read Robertson Pty Ltd t/a Marine Solutions WA (Marine Solutions) is the manufacturer of fish emulsion products within O'Connor. The premises is located within an industrial zoned area and is surrounded by industrial zoning to the north, east and west of the premises. The nearest residences are located approximately 20 metres south of the premises.

Raw fish materials arrive at the premises in a chilled condition from fish processing plants within the Fremantle and adjacent areas. The fish materials are placed into an onsite refrigerator prior to being processed onsite. The processing of the fish waste is conducted through mincing to reduce size of materials, screening, and using heat and formic acid to cause reactions within the vessel to liquefy the materials into a final product. The whole process takes approximately 9 hours.

The main emissions are odour and solid wastes. The process is undertaken within an enclosed factory inside a reaction vessel and all fish materials are chilled to ensure freshness and reduce odour. Solid wastes are stored within bunded areas and are removed offsite by the City of Fremantle as required. Odour has not been an issue at this premises however due to the nature of the operations and materials used at the premises, odour is likely to be generated from time to time and it is appropriate to use standard conditions to address this.

This Licence is for the operation of an existing premises.

The licences issued for the Premises are:

Instrument log		
Instrument	Issued	Description
L8776/2013/1	26/09/2013	New application

#### Severance

It is the intent of these Licence conditions that they shall operate so that, if a condition or a part of a condition is beyond the power of this Licence to impose, or is otherwise *ultra vires* or invalid, that condition or part of a condition shall be severed and the remainder of these conditions shall nevertheless be valid to the extent that they are within the power of this Licence to impose and are not otherwise *ultra vires* or invalid.

**END OF INTRODUCTION**





## Licence conditions

### 1 General

#### 1.1 Interpretation

1.1.1 In the Licence, definitions from the *Environmental Protection Act 1986* apply unless the contrary intention appears.

1.1.2 For the purposes of this Licence, unless the contrary intention appears:

“the Act” means the *Environmental Protection Act 1986*;

“annual period” means the inclusive period from 1 July until 30 June in the following year;

“Code of Practice for the Storage and handling of dangerous goods” means the Storage and handling of dangerous goods, Code of Practice, Department of Mines and Petroleum, Government of Western Australia;

“dangerous goods” has the meaning defined in the Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007;

“Director” means Director, Environmental Regulation Division of the Department of Environment Regulation for and on behalf of the Chief Executive Officer as delegated under section 20 of the *Environmental Protection Act 1986*;

“Director” for the purpose of correspondence means;

Regional Leader, Industry Regulation, Swan Region  
Department of Environment Regulation  
Locked Bag 33  
CLOISTERS SQUARE WA 6850  
Telephone: (08) 9333 7510  
Facsimile: (08) 9333 7550

“environmentally hazardous material” means material (either solid or liquid raw materials, materials in the process of manufacture, manufactured products, products used in the manufacturing process, by-products and waste) which if discharged into the environment from or within the premises may cause pollution or environmental harm. Note: Environmentally hazardous materials include dangerous goods where they are stored in quantities below placard quantities. The storage of dangerous goods above placard quantities is regulated by the Department of Mines and Petroleum;

“fugitive emissions” means all emissions not arising from point sources identified in Sections 2.2, 2.3, 2.4 and 2.5;

“Licence” means this Licence numbered L8776/2013/1 and issued under the *Environmental Protection Act 1986*;

“Licensee” means the person or organisation named as Licensee on page 1 of the Licence;

“Premises” means the area defined in the Premises Map in Schedule 1 and listed as the Premises address on page 1 of the Licence;



“**Schedule 1**” means Schedule 1 of this Licence unless otherwise stated;

“**Schedule 2**” means Schedule 2 of this Licence unless otherwise stated;

1.1.3 Any reference to an Australian or other standard in the Licence means the relevant parts of the current version of that standard.

1.1.4 Any reference to a Guideline or Code of Practice in the Licence means the current version of the Guideline or Code of Practice.

## **1.2 General conditions**

1.2.1 Nothing in the Licence shall be taken to authorise any emission that is not mentioned in the Licence, where the emission amounts to:

- (a) pollution;
- (b) unreasonable emission;
- (c) discharge of waste in circumstances likely to cause pollution; or
- (d) being contrary to any written law.

1.2.2 The Licensee shall operate and maintain all pollution control and monitoring equipment to the manufacturer's specification or any relevant and effective internal management system.

1.2.3 The Licensee, except where storage is prescribed in section 1.3, shall ensure that environmentally hazardous materials are stored in accordance with the Code of Practice for the Storage and handling of dangerous goods.

1.2.4 The Licensee shall immediately recover, or remove and dispose of spills of environmentally hazardous materials outside an engineered containment system.

## **1.3 Premises operation**

1.3.1 The Licensee shall ensure that all fish products that cannot be processed on the day of arrival, are stored within the fridge unit until they are able to be processed.



## **2 Emissions**

### **2.1 General**

- 2.1.1 The Licensee shall record and investigate the exceedance of any descriptive or numerical limit, and/or target in this section.

### **2.2 Point source emissions to air**

There are no specified conditions relating to point source emissions to air in this section.

### **2.3 Point source emissions to surface water**

There are no specified conditions relating to point source emissions to surface water in this section.

### **2.4 Point source emissions to groundwater**

There are no specified conditions relating to point source emissions to groundwater in this section.

### **2.5 Emissions to land**

There are no specified conditions relating to emissions to land in this section.

### **2.6 Fugitive emissions**

There are no specified conditions relating to fugitive emissions in this section.

### **2.7 Odour**

- 2.7.1 The Licensee shall ensure that odour emitted from the Premises does not unreasonably interfere with the health, welfare, convenience, comfort or amenity of any person who is not on the Premises.

### **2.8 Noise**

There are no specified conditions relating to noise in this section.

## **3 Monitoring**

There are no specified conditions relating to monitoring in this section.





## 4 Improvements

There are no specified improvement conditions in this section.

## 5 Information

### 5.1 Records

5.1.1 All information and records required by the Licence shall:

- (a) be legible;
- (b) if amended, be amended in such a way that the original and subsequent amendments remain legible or are capable of retrieval;
- (c) except for records listed in 5.1.1(d) be retained for at least 6 years from the date the records were made or until the expiry of the Licence or any subsequent licence; and
- (d) for those following records, be retained until the expiry of the Licence and any subsequent licence:
  - (i) off-site environmental effects; or
  - (ii) matters which affect the condition of the land or waters.

5.1.2 The Licensee shall ensure that:

- (a) any person left in charge of the Premises is aware of the conditions of the Licence and has access at all times to the Licence or copies thereof; and
- (b) any person who performs tasks on the Premises is informed of all of the conditions of the Licence that relate to the tasks which that person is performing.

5.1.3 The Licensee shall complete an Annual Audit Compliance Report indicating the extent to which the Licensee has complied with the conditions of the Licence, and any previous licence issued under Part V of the Act for the Premises for the previous annual period.

5.1.4 The Licensee shall implement a complaints management system that as a minimum records the number and details of complaints received concerning the environmental impact of the activities undertaken at the Premises and any action taken in response to the complaint.

### 5.2 Reporting

5.2.1 The Licensee shall submit to the Director an Annual Environmental Report within 28 calendar days after the end of the annual period. The report shall contain the information listed in Table 5.2.1 in the format or form specified in that table.

Table 5.2.1: Annual Environmental Report		
Condition or table (if relevant)	Parameter	Format or form <sup>1</sup>
-	Summary of any failure or malfunction of any pollution control equipment or any incidents that have occurred during the annual period and any action taken	None specified
5.1.3	Compliance	Annual Audit Compliance Report (AACR)
5.1.4	Complaints summary	None specified

Note 1: Forms are in Schedule 2



### 5.3 Notification

5.3.1 The Licensee shall ensure that the parameters listed in Table 5.3.1 are notified to the Director in accordance with the notification requirements of the table.

Condition or table (if relevant)	Parameter	Notification requirement <sup>1</sup>	Format or form <sup>2</sup>
2.1.1	Breach of any limit specified in the Licence	Part A: As soon as practicable but no later than 5pm of the next usual working day.	N1
-	Any failure or malfunction of any pollution control equipment or any incident which has caused, is causing or may cause pollution	Part B: As soon as practicable	

Note 1: Notification requirements in the licence shall not negate the requirement to comply with s72 of the Act

Note 2: Forms are in Schedule 2





## Schedule 1: Maps

### Premises map

The Premises is shown in the map below. The pink line depicts the Premises boundary.







## Schedule 2: Reporting & notification forms

These forms are provided for the proponent to report monitoring and other data required by the Licence. They can be requested in an electronic format.

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Licence: L8776/2013/1 Licensee: Read-Robertson Pty Ltd  
Form: AACR Period :  
Name: Annual Audit Compliance Report

### Annual Audit Compliance Report

#### Section A: Statement of compliance with Licence conditions

Were all conditions of licence complied with within the annual period?	
Yes	<input type="checkbox"/> Initial Sections A & B, then proceed to Section C
No	<input type="checkbox"/> Initial Section A, then proceed to Section B

Each page must be initialled by the person(s) who signs Section C of this Annual Audit Compliance Report (AACR).

Initial:



**Section B: Details of non-compliance with Licence condition**

a) Licence condition not complied with?	
b) Date(s) b) Date(s) and time(s) the non compliance occurred, if applicable?	
c) Was this non compliance reported to DER?	
<input type="checkbox"/> Yes, and <input type="checkbox"/> Reported to DER verbally   Date <input type="checkbox"/> Reported to DER in writing   Date	<input type="checkbox"/> No
d) Has DER taken, or finalised any action in relation to the non compliance?	
e) Summary of particulars of non compliance, and what was the environmental impact?	
f) If relevant, the precise location where the non compliance occurred (attach map or diagram)	
g) Cause of non compliance	
h) Action taken or that will be taken to mitigate any adverse effects of the non compliance	
i) Action taken or that will be taken to prevent recurrence of the non compliance	

Please use a separate page for each Licence condition that was not complied with. Each page must be initialled by the person(s) who signs Section C of this AACR

Initial:



**Section C: Signature and certification**

This AACR must only be signed by a person(s) with legal authority to sign it as defined below. Please tick the box next to the category that describes how this AACR is being signed. If you are uncertain about who is entitled to sign or which category to tick, please contact the licensing officer for your premises.

If the Licence holder is	The AACR must be signed and certified:
an individual	<input type="checkbox"/> by the individual Licence holder, or <input type="checkbox"/> by a person approved in writing by the Chief Executive Officer (CEO) of DER to sign on the Licensee's behalf.
a corporation	<input type="checkbox"/> by affixing the common seal of the Licensee in accordance with the Corporations Act 2001; or <input type="checkbox"/> by two directors of the Licensee; or <input type="checkbox"/> by a director and a company secretary of the Licensee, or <input type="checkbox"/> if the Licensee is a proprietary company that has a sole director who is also the sole company secretary – by that director, or <input type="checkbox"/> by the principal executive officer of the Licensee; or <input type="checkbox"/> by a person with authority to sign on the Licensee's behalf who is approved in writing by the CEO of DER.
A public authority (other than a local government)	<input type="checkbox"/> by the principal executive officer of the Licensee; or <input type="checkbox"/> by a person with authority to sign on the Licensee's behalf who is approved in writing by the CEO of DER.
a local government	<input type="checkbox"/> by the CEO of the Licensee; or <input type="checkbox"/> by affixing the seal of the local government.

It is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give information on this form that to their knowledge is false or misleading in a material particular. There is a maximum penalty of \$50,000 for an individual or body corporate.

I/We declare that the information in this AACR is correct and not false or misleading in a material particular.

Signature:

Signature:

Name: (printed)

Name: (printed)

Position:

Position:

Date:

Date:

Seal (if signing under seal)





Licence: L8776/2013/1  
Form: N1

Licensee: Read-Robertson Pty Ltd  
Date of breach:

**Notification of detection of the breach of a limit or any failure or malfunction of any pollution control equipment or any incident which has caused, is causing or may cause pollution.**

These pages outline the information that the operator must provide.  
Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

**Part A**

Licence Number	
Name of operator	
Location of Premises	
Time and date of the detection	

<b>Notification requirements for the breach of a limit</b>	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value	
Date and time of monitoring	
Measures taken, or intended to be taken, to stop the emission	

<b>Notification requirements for any failure or malfunction of any pollution control equipment or any incident which has caused, is causing or may cause pollution</b>	
Date and time of event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken , or intended to be taken, to stop any emission.	
Description of the failure or accident	



### Part B

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident.	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission.	
The dates of any previous N1 notifications for the Premises in the preceding 24 months.	

Name	
Post	
Signature on behalf of Read-Robertson Pty Ltd	
Date	



# Decision Document

## *Environmental Protection Act 1986, Part V*

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**Proponent:** Read-Robertson Pty Ltd

**Licence:** L8776/2013/1

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**Registered office:** 4 The Mews  
KARDINYA WA 6163

**ACN:** 082 948 730

**Premises address:** Marine Solutions WA  
Unit 1  
13 Bowen Street  
O'CONNOR WA 6163  
Being Lot 9 on Plan 8322 as depicted in Schedule 1.

**Issue date:** Thursday, 3 October 2013

**Commencement date:** Thursday, 3 October 2013

**Expiry date:** Tuesday, 2 October 2018

### Decision

Based on the assessment detailed in this document, the Department of Environment Regulation (DER) has decided to issue a licence. DER considers that in reaching this decision, it has taken into account all relevant considerations and that Licence and its conditions will ensure that an appropriate level of environmental protection is provided.

Decision document prepared by:

Lauren Fox  
Regional Environmental Officer

Decision Document Authorised By:

Marko Pasalich  
Regional Leader





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### 1 Purpose of this Document

This decision document explains how DER has assessed and determined the application for a works approval or licence, and provides a record of DER's decision-making process and how relevant factors have been taken into account. Stakeholders should note that this document is limited to DER's assessment and decision making under Part V of the *Environmental Protection Act 1986*. Other approvals may be required for the proposal, and it is the proponent's responsibility to ensure they have all relevant approvals for their Premises.

#### Works approval and licence conditions

DER has three types of conditions that may be imposed on works approvals and licences. They are as follows;

##### Standard conditions (SC)

DER has standard conditions that are imposed on all works approvals and licences regardless of the activities undertaken on the Premises and the information provided in the application. These are included as the following conditions on works approvals and licences:

Works approval conditions: 1.1.1-1.1.3, 1.2.1, 1.2.2, 5.1.1 and 5.1.2.

Licence conditions: 1.1.1-1.1.4, 1.2.1-1.2.4, 5.1.1-5.1.4 and 5.2.1.

For such conditions, justification within the Decision Document is not provided.

##### Optional standard conditions (OSC)

In the interests of regulatory consistency DER has a set of optional standard conditions that can be imposed on works approvals and licences. DER will include optional standard conditions as necessary, and are likely to constitute the majority of conditions in any licence. The inclusion of any optional standard conditions are justified in Section 4 of this document.

##### Non standard conditions (NSC)

Where the proposed activities require conditions outside the standard conditions suite DER will impose one or more non-standard conditions. These include both premises and sector specific conditions, and are likely to occur within few licences. Where used, justification for the application of these conditions will be included in Section 4.



**2**

**Administrative Summary**

Administrative Details					
Application Type	Works Approval <input type="checkbox"/> New Licence <input checked="" type="checkbox"/> Licence Amendment <input type="checkbox"/> Works Approval Amendment <input type="checkbox"/>				
Activities that cause the premises to become prescribed premises	<table border="1"> <thead> <tr> <th>Category Number(s)</th> <th>Design Capacity</th> </tr> </thead> <tbody> <tr> <td>31</td> <td>Not more than 2,000 tonnes per year</td> </tr> </tbody> </table>	Category Number(s)	Design Capacity	31	Not more than 2,000 tonnes per year
Category Number(s)	Design Capacity				
31	Not more than 2,000 tonnes per year				
Application Verified	Date:				
Application Fee Paid	Date:				
Works Approval has been complied with	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
Compliance Certificate received	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
Commercial-in-confidence claim	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>				
Commercial-in-confidence claim outcome					
Is the proposal a Major Resource Project?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>				
Was the proposal referred to the Environmental Protection Authority (EPA) under Part IV of the <i>Environmental Protection Act 1986</i> ?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Referral Decision No: Managed under Part V <input type="checkbox"/> Assessed under Part IV <input type="checkbox"/>				
Is the proposal subject to Ministerial Conditions?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Ministerial Statement No: EPA Report No:				
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the <i>Environmental Protection Act 1986</i> )?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Department of Water consulted Yes <input type="checkbox"/> No <input type="checkbox"/>				
Is the Premises within an Environmental Protection Policy (EPP) Area	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>				
If Yes include details of which EPP(s) here.					
Is the Premises subject to any EPP requirements?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>				
If Yes, include details here, e.g. Site is subject to SO <sub>2</sub> requirements of Kwinana EPP.					





### 3 Executive summary of proposal

Read-Robertson Pty Ltd, trading as Marine Solutions WA, owns and operates an existing chemical manufacturing business specialising in the manufacturing of fish emulsion products within the suburb of O'Connor. Marine Solutions WA have been operating from this premises since 2004.

As this is an existing premises, there are no works required. The current operations occur within an enclosed building that is covered in a hardstand. The building is also fitted with a floor drain which discharges to Water Corporation sewer under Industrial Waste Permit No. 16526.

The occupier accepts raw fish wastes and materials (predominantly the heads and frames of fresh fish) from fish processing plants such as Fremantle Sardines, Catalano Seafoods, Sealanes and Coastal Fisheries. The fish materials arrive chilled at the premises in mobile bins with lids and are placed in the fridge room at the premises for processing the following morning.

For processing of the fish materials, the materials are placed into a mincer to reduce the size of the material which is then deposited into a sealed hopper and transferred into the reaction vessel. Upon entering the reaction vessel, small doses of organic 85% Formic acid or phosphoric acid is introduced and blended into the minced fish material as a stabilizer. The material then undergoes chemical reactions with the addition of heating to 40 C which causes the material to liquefy.

Once the materials have completely liquefied, the pH is taken and corrected as required. Once the desired pH of 3 – 3.8 is obtained, the temperature is then increased to 75 C to denature the enzymes and destroy any bacteria. Once this has been completed, the hot liquid is screened to remove any bones or other insoluble material, and the finished product is pumped out to the final container. The final containers can be either 20 litre or 200 litre drums, or 1000 and 1200 litre IBC containers. Each batch takes approximately 9 hours from start to finish.

Each final container is marked with the date and identification number of each batch and stored within a bunded, hardstand area on pallets outside the building awaiting despatch to clients. Each container will have a label attached to it prior to despatch which provides a description of the contents.

All fish emulsion products are manufactured in accordance with the industry standards set by the National Association for Sustainable Agriculture of Australia and the International Federation of Organic Agriculture Movements.

At each stage of the process (mincing, screening, pumping), the area is washed down with fresh water. The area and machinery are also washed down with fresh water at the end of each day and sanitised with Sodium Hypochloride or Green Organic and Environmental (GOE) which is a natural cleaning product. The building is washed with a high pressure hose on a weekly basis. Any spills within the building are washed down with water and then sanitised. Any spills that occur outside are similarly washed down with water, sanitised and soak wells pumped out by an applicable company.

As the fresh fish materials arrive at the premises chilled and are placed into the premises fridge, the generation of odour is reduced. The processing of the material occurs within a building and the sanitising of the premises at the end of each batch further assists in reducing odours. If odour is detected within the building, an organic deodoriser is used.

The waste generated from the process is stored in an enclosed bin and placed into the fridge until offsite collection from the City of Fremantle waste department.





## 4 Decision Table

DECISION TABLE				
Works Approval / Licence Section	Condition Number W = Works Approval L = Licence	OSC or NSC	Justification (including risk description & decision methodology where relevant)	Reference Documents
General Conditions	L1.3.1	NSC	<p><b>Operation</b>  <i>Emission Significance – 3</i>  <i>Socio-political context – No concern or interest</i>  <i>Risk Assessment – D= EIPs, other management mechanisms/licence conditions (monitoring/reporting)/other regulatory tools</i></p> <p>Raw fish wastes have the capacity to generate odour if not processed quickly or stored outside a refrigerated unit. Condition 1.3.1 has been added to the licence to ensure the licensee stores all fish products within the refrigerated unit if they are unable to be processed on the day they are received. This will assist in reducing odour emissions.</p>	Application supporting documentation
	L2.1.1	OSC	<p>Descriptive limits will be set for odour through condition 2.7.1 of the licence and therefore OSC regarding recording and investigation of exceedances of limits or targets has been included.</p>	Application supporting documentation
Point source emissions to air including monitoring	N/A	N/A	<p>There are no point source emissions to air from the premises.          Therefore no specific conditions relating to point source emissions to air or monitoring these emissions are required to be added to the licence</p>	
Point source emissions to surface water including monitoring	N/A	N/A	<p>There are no point source emissions to surface water from the premises. Therefore no specific conditions relating to point source emissions to surface water or monitoring these emissions are required to be added to the licence</p>	



**DECISION TABLE**

Works Approval / Licence Section	Condition Number W = Works Approval L = Licence	OSC or NSC	Justification (including risk description & decision methodology where relevant)	Reference Documents
Point source emissions to groundwater including monitoring	N/A	N/A	There are no point source emissions to groundwater from the premises. Therefore no specific conditions relating to point source emissions to groundwater or monitoring these emissions are required to be added to the licence	
Emissions to land including monitoring	N/A	N/A	There are no emissions to land from the premises. Therefore no specific conditions relating to emissions to land or monitoring these emissions are required to be added to the licence	
Fugitive Emissions	N/A	N/A	There are no fugitive emissions from the premises. Therefore no specific conditions relating to fugitive emissions are required to be added to the licence	
Odour	L2.7.1	OSC	<p><b>Operation</b>  <i>Emission Significance</i> – 3  <i>Socio-political context</i> – No concern or interest  <i>Risk Assessment</i> – D – EIPs, other management mechanisms/licence conditions (monitoring/reporting)/other regulatory tools</p> <p>Some odour will be generated from the premises operations. Commercial businesses are adjacent to the premises however there has been no community concern regarding this emission. It is anticipated that current practices at the premises are sufficient at reducing odour however as there is the risk of odour being generated due to the nature of the operations and materials used, it is recommended to include the optional standard condition for ensuring odour does not impact on others beyond the premises boundary.</p>	<p>General provisions of the <i>Environmental Protection Act 1986</i></p> <p>Application supporting information</p>



**DECISION TABLE**

Works Approval / Licence Section	Condition Number W = Works Approval L = Licence	OSC or NSC	Justification (including risk description & decision methodology where relevant)	Reference Documents
Noise	N/A	N/A	There are no noise emissions from the premises. Therefore no specific conditions relating noise emissions are required to be added to the licence	
Monitoring General	N/A	N/A	There is no requirement for monitoring at the premises	
Monitoring of inputs and outputs	N/A	N/A	There is no requirement to monitor inputs and outputs during operation of the premises.	
Process Monitoring	N/A	N/A	There is no requirement to monitor processes during operation of the premises.	
Ambient Quality Monitoring	N/A	N/A	There is no requirement to monitor the ambient environmental quality during operation of the premises	
Meteorological monitoring	N/A	N/A	There is no requirement to monitor meteorological data during operation of the premises	
Improvements	N/A	N/A	There is no requirement for improvements at the premises	
Information	L5.3.1	OSC	Licence limits are defined in condition 2.7.1 and exceedances of these need to be reported to DER.	Application supporting information





## 5 Advertisement and Consultation Table

Date	Event	Comments received/Notes	How comments were taken into consideration
02/09/2013	Application advertised in West Australian (or other relevant newspaper)	No comments received	N/A
26/08/2013	Application referred to interested parties listed: City of Fremantle	Comments received 17/09/2013 Advised premises has appropriate planning approval for operations. Main emission identified is odour which is requested to be controlled.	Licence conditions for odour have been included on the licence.
19/09/2013	Proponent sent a copy of draft instrument	Comments received 23/09/2013	Two minor administrative errors were identified and corrected
30/09/2013	Issued Instrument advertised in West Australian (or other relevant newspaper)	N/A – comments will be directed to Appeals Convenor	N/A



## Appendix A

# EMISSIONS AND DISCHARGES RISK ASSESSMENT MATRIX

Note: These matrix are taken from the DEC Officer's Guide to Emissions and Discharges Risk Assessment (2006).

**Table 3: Measures of Significance of Emissions**

Emissions as a percentage of the relevant emission or ambient standard		Worst Case Operating Conditions (95 <sup>th</sup> Percentile)			
		>100%	50 – 100%	20 – 50%	<20%*
Normal Operating Conditions (50 <sup>th</sup> Percentile)	>100%	5	N/A	N/A	N/A
	50 – 100%	4	3	N/A	N/A
	20 – 50%	4	3	2	N/A
	<20%*	3	3	2	1

\*For reliable technology, this figure could increase to 30%

**Table 4: Socio-Political Context of Each Regulated Emission**

		Relative proximity of the interested party with regards to the emission				
		Immediately Adjacent	Adjacent	Nearby	Distant	Isolated
Level of Community Interest or Concern*	5	High	High	Medium High	Medium	Low
	4	High	High	Medium High	Medium	Low
	3	Medium High	Medium High	Medium	Low	No
	2	Low	Low	Low	Low	No
	1	No	No	No	No	No

Note: These examples are not exclusive and professional judgement is needed to evaluate each specific case

\*This is determined by DER using the *Officer's Guide to Emissions and Discharges Risk Assessment* (2006).

**Table 5: Emissions Risk Reduction Matrix**

		Significance of Emissions				
		5	4	3	2	1
Socio-Political Context	High	A	A	B	C	D
	Medium High	A	A	B	C	D
	Medium	A	B	B	D	E
	Low	A	B	C	D	E
	No	B	C	D	E	E

### PRIORITY MATRIX ACTION DESCRIPTORS

A = Do not allow (fix)

B = licence condition (setting limits + EMPs - short timeframes) (setting targets optional)

C = licence condition (setting targets + EMPs - longer timeframes)

D= EIPs, other management mechanisms/licence conditions (monitoring/reporting)/other regulatory tools

E = No regulation, other management mechanisms

