



Licence

Environmental Protection Act 1986, Part V

Licensee: **Advanced Pet Care of Australia Pty Ltd**

Licence: **L6765/1997/12**

Registered office: 62 Farmer Street
 NORTH PERTH WA 6006

ACN: 087 757 551

Premises address: Advanced Pet Care
 40 Lionel Street
 NAVAL BASE WA 6165

Being Lot 50 on Diagram 89697
 Certificate of Title Volume 2051 Folio 979
 as depicted in Schedule 1.

Issue date: Tuesday, 5 April 2016

Commencement date: Thursday, 7 April 2016

Expiry date: Sunday, 6 April 2036

Prescribed premises category

Schedule 1 of the *Environmental Protection Regulations 1987*

Category number	Category description	Category production or design capacity	Approved Premises production or design capacity
23	Animal feed manufacturing: premises (other than premises within category 15 or 16) on which animal food is manufactured or processed	1,000 tonnes or more per year	22,000 tonnes per year

Conditions

This Licence is subject to the conditions set out in the attached pages.

Date signed: 5 April 2016

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



Contents

Licence	1
Contents	2
Introduction	2
Licence conditions	4
1 General	4
2 Emissions	5
3 Information	5
Schedule 1: Maps	7
Schedule 2: Reporting & notification forms	8

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 advise on and implement strategies for a healthy environment for the benefit of all current and future Western Australians.

DER has responsibilities under Part V of the *Environmental Protection Act 1986* (the Act) for the licensing of prescribed premises. Through this process DER regulates to prevent, control and abate pollution and environmental harm to conserve and protect the environment. DER also monitors and audits compliance with works approvals and licence conditions, takes enforcement action as appropriate and develops and implements licensing and industry regulation policy.

Licence requirements

This Licence is issued under Part V of the Act. Conditions contained within 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.

Ministerial conditions

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

Premises description and Licence summary

The Advanced Pet Care premises manufactures dried animal feed for the commercial aquaculture industry and pet food market. The location in Naval Base is within the Kwinana Industrial Area precinct and zoned 'general industry' with surrounding premises also zoned 'general industry.' The nearest environmental receptors are a Bush Forever site approximately 1 km north and a wetland approximately 1 km east. There are no known dwellings in close proximity with the nearest likely to be in excess of 2 km north east in Hope Valley. The nearest receptors are adjacent and nearby industrial or commercial receptors. The premises is within Area A of the *Environmental Protection (Kwinana)(Atmospheric Wastes) Policy 1999* area.

The key risks associated with emissions and discharges relate to point source emissions of particulate matter and odour and fugitive emissions of dust and odour. The Extrusion Shed has a baghouse for removal of particulate from gaseous emissions which are emitted from a 6 m stack known as the 'main exhaust stack.' There is also an odour control system to treat odour produced by the production process, One unit treats odours over the oven, whilst the other unit treats odours discharged through the main exhaust stack. Separate odour control misting units are fitted externally to Extrusion Shed doors for the purpose of managing fugitive odour emissions.

This Licence is the successor to licence L6765/1997/11 and includes a conversion of the licence into a new format.

The licences and works approvals issued for the Premises since 3 April 2013 are:

Instrument log		
Instrument	Issued	Description
L6765/1997/11	03/04/2013	Licence renewal
L6765/1997/12	06/04/2016	Licence renewal including conversion to a new format

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:

'Act' means the *Environmental Protection Act 1986*;

'annual period' means the inclusive period from 7 April until 6 April in the following year;

'CEO' means Chief Executive Officer of the Department of Environment Regulation;

'CEO' for the purpose of correspondence means;

Chief Executive Officer
Department Administering the *Environmental Protection Act 1986*
Locked Bag 33
CLOISTERS SQUARE WA 6850
Email: info@der.wa.gov.au

'Licence' means this Licence numbered L6765/1997/12 and issued under the Act;

'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; and

'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 the standard in force from time to time during the term of this Licence.

1.1.4 Any reference to a guideline or code of practice in the Licence means the version of that guideline or code of practice in force from time to time, and shall include any amendments or replacements to that guideline or code of practice made during the term of this Licence.

1.1.5 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 General conditions

1.2.1 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 baghouse and deodorising system as specified in Table 2.2.1 and odour control misting system specified in condition 2.3.1 are operating while animal feed manufacturing is occurring within the Extruding and Packaging Shed.
- 1.3.2 The Licensee shall inspect and review the operational performance of the baghouse and deodorising system referred to in Table 2.2.1 at least every 3 months:

2 Emissions

2.1 General

- 2.1.1 The Licensee shall record and investigate the exceedance of any descriptive or numerical limit specified in any part of section 2 of this Licence.

2.2 Point source emissions to air

- 2.2.1 The Licensee shall ensure that where waste is emitted to air from the emission points in Table 2.2.1 and identified on the map of emission points in Schedule 1 it is done so in accordance with the conditions of this Licence.

Table 2.2.1: Emission points to air			
Emission point reference and location on Map of emission points	Emission Point	Emission point height (m)	Source, including any abatement
A1	Main exhaust stack	6	Extrusion and Packaging Shed via a baghouse and deodorising system

2.3 Odour

- 2.3.1 The Licensee shall operate and maintain an odour control misting system on the Extrusion and Packaging Shed doors.

3 Information

3.1 Records

- 3.1.1 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 3.1.1(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.



- 3.1.2 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.
- 3.1.3 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.
- 3.1.4 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.

3.2 Reporting

- 3.2.1 The Licensee shall submit to the CEO an Annual Environmental Report within 35 calendar days after the end of the annual period. The report shall contain the information listed in Table 3.2.1 in the format or form specified in that table.

Table 3.2.1: Annual Environmental Report		
Condition or table (if relevant)	Parameter	Format or form¹
-	Summary of any failure or malfunction of any pollution control equipment and any environmental incidents that have occurred during the annual period and any action taken	None specified
3.1.3	Compliance	Annual Audit Compliance Report (AACR)
3.1.4	Complaints summary	None specified

Note 1: Forms are in Schedule 2

3.3 Notification

- 3.3.1 The Licensee shall ensure that the parameters listed in Table 3.3.1 are notified to the CEO in accordance with the notification requirements of the table.

Table 3.3.1: Notification requirements			
Condition or table (if relevant)	Parameter	Notification requirement¹	Format or form²
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. Part B: As soon as practicable	N1

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

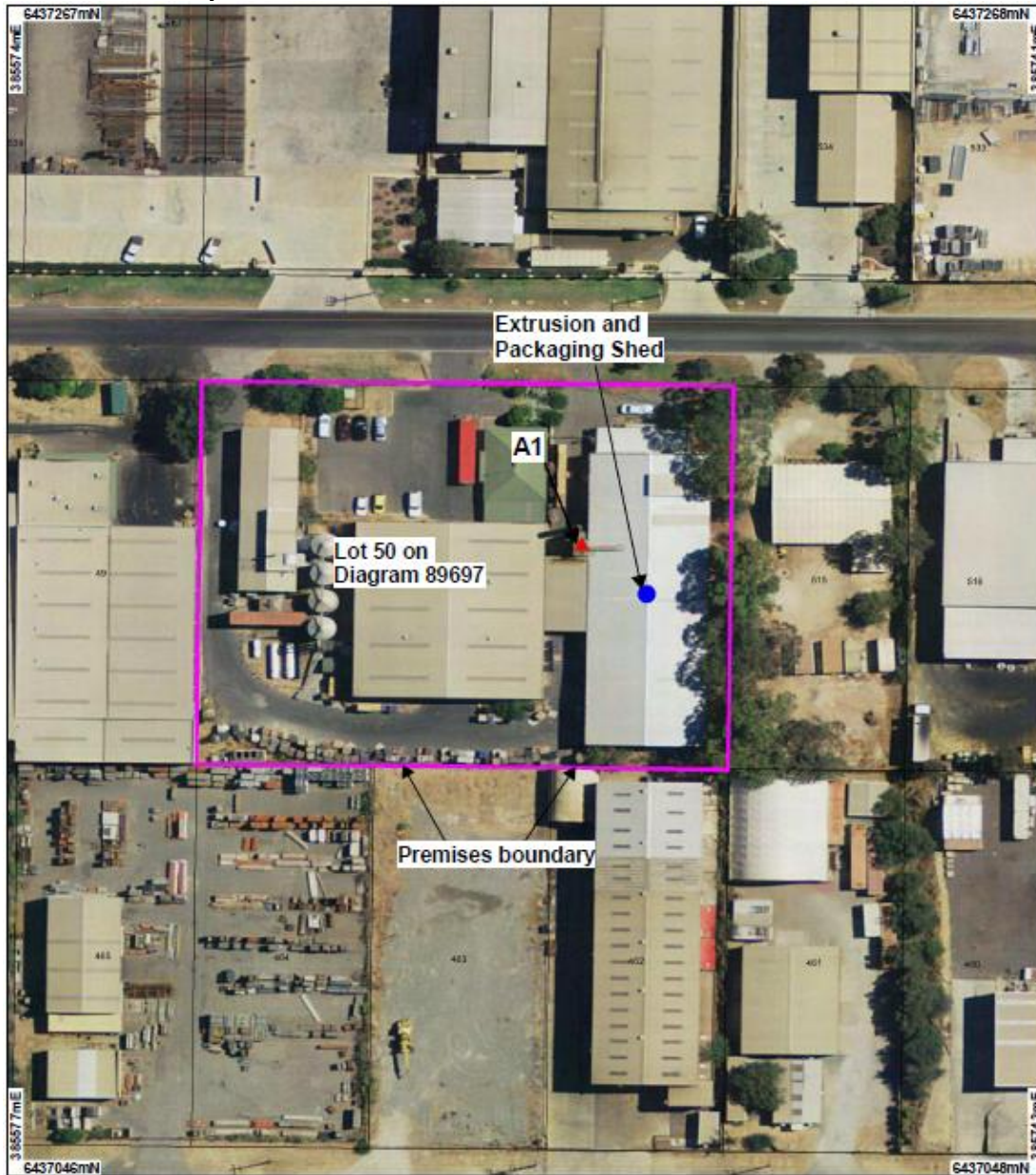
Note 2: Forms are in Schedule 2



Schedule 1: Maps

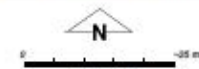
Premises map and map of emission points

The Premises and emission points are shown in the map below. The pink line depicts the Premises boundary.



LEGEND

- Premises
- Parth Metropolitan Area
Central 15cm Orthomosaic -
Lansgate 1014



Scale 1:976
(Approximate when reproduced at A4)

Geocentric Datum Australia 1994

Note: the data in this map have not been projected. This may result in geometric distortion or measurement inaccuracies.

Prepared by: chris
Prepared for:
Date: 30/03/2016 2:08:23 PM

Information derived from this map should be confirmed with the data custodian acknowledged by the agency acronym in the legend.



WA Crown Copyright 2012

* Project Data. This data has not been quality assured. Please contact map author for details.



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.

ANNUAL AUDIT COMPLIANCE REPORT PROFORMA

SECTION A LICENCE DETAILS

Licence Number:	Licence File Number:
Company Name: Trading as:	ABN:
Reporting period: _____ to _____	

STATEMENT OF COMPLIANCE WITH LICENCE CONDITIONS

- Were all conditions of the Licence complied with within the reporting period? (please tick the appropriate box)

Yes Please proceed to Section C

No Please 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 C

SIGNATURE AND CERTIFICATION

This Annual Audit Compliance Report (AACR) may only be signed by a person(s) with legal authority to sign it. The ways in which the AACR must be signed and certified, and the people who may sign the statement, are set out 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 Annual Audit Compliance Report must be signed and certified:
An individual	<input type="checkbox"/> <input type="checkbox"/>	by the individual licence holder, or by a person approved in writing by the Chief Executive Officer of the Department of Environment Regulation to sign on the licensee's behalf.
A firm or other unincorporated company	<input type="checkbox"/> <input type="checkbox"/>	by the principal executive officer of the licensee; or by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation.
A corporation	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	by affixing the common seal of the licensee in accordance with the <i>Corporations Act 2001</i> ; or by two directors of the licensee; or by a director and a company secretary of the licensee, or if the licensee is a proprietary company that has a sole director who is also the sole company secretary – by that director, or by the principal executive officer of the licensee; or by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation.
A public authority (other than a local government)	<input type="checkbox"/> <input type="checkbox"/>	by the principal executive officer of the licensee; or by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation.
a local government	<input type="checkbox"/> <input type="checkbox"/>	by the chief executive officer of the licensee; or 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 annual audit compliance report 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: L6765/1997/12
 Form: N1

Licensee: Advanced Pet Care of Australia Pty Ltd
 Date of breach:

Notification of detection of the breach of a limit.

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	

Notification requirements for the breach of a limit	
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	



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 Advanced Pet Care of Australia Pty Ltd	
Date	



Decision Document

Environmental Protection Act 1986, Part V

Proponent: **Advanced Pet Care of Australia Pty Ltd**

Licence: **L6765/1997/12**

Registered office: 62 Farmer Street
NORTH PERTH WA 6006

ACN: 087 757 551

Premises address: Advanced Pet Care
40 Lionel Street
NAVAL BASE WA 6165

Being Lot 50 on Diagram 89697
Certificate of Title Volume 2051 Folio 979

Issue date: Wednesday, 6 April 2016

Commencement date: Thursday, 7 April 2016

Expiry date: Sunday, 6 April 2036

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.

Decision Document prepared by:

Chris Malley
Licensing Officer

Decision Document authorised by:

Lauren Trott
Delegated Officer



Contents

Decision Document	1
Contents	2
1 Purpose of this Document	2
2 Administrative summary	3
3 Executive summary of proposal and assessment	4
4 Decision table	5
5 Advertisement and consultation table	12
6 Risk Assessment	13

1 Purpose of this Document

This decision document explains how DER has assessed and determined the application 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.



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	Category number(s)	Assessed design capacity
	23	22,000 tonnes per annual period
Application verified	Date: 03/02/2016	
Application fee paid	Date: 25/02/2016	
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	N/A	
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 checked="" type="checkbox"/>	
Is the Premises within an Environmental Protection Policy (EPP) Area	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
The premises is within Area A of the <i>Environmental Protection (Kwinana)(Atmospheric Wastes) Policy 1999</i> area.		
Is the Premises subject to any EPP requirements?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
The premises is subject to the ambient total suspended particulate criteria specified in the policy.		



4 Decision table

All applications are assessed in line with the *Environmental Protection Act 1986*, the *Environmental Protection Regulations 1987* and DER's Operational Procedure on Assessing Emissions and Discharges from Prescribed Premises. Where other references have been used in making the decision they are detailed in the decision document.

DECISION TABLE			
Works Approval / Licence section	Condition number	Justification (including risk description & decision methodology where relevant)	Reference documents
General conditions	1.2.1	<p><u>Emission Description</u> <i>Emission:</i> Loss of containment, spillage or leakage of liquid raw materials such as tallow, canola oil and sunflower oil in IBCs <i>Impact:</i> Soil contamination. Runoff into drains. Site is located within an industrial area. <i>Controls:</i> Liquid raw materials are stored in IBCs within an a bunded storage area.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Moderate</p> <p><u>Regulatory Controls</u> The new licence includes condition 1.2.1 that specifies that the licensee is to immediately recover, remove and dispose of spills of environmental hazardous materials outside an engineered containment system. The condition reduces the risk of environmental contamination and more serious runoff events.</p>	Licence L6765/1997/11
Premises operation	1.3.1	<p>Condition 1.3.1 has been included in the new licence. This has been justified by the point source emissions to air assessment below. The condition replaces conditions 7, 11, 12 and 15 on the previous licence.</p> <p>Conditions 8, 9, 13 and 14 have been replaced by condition 1.3.2 to require ongoing maintenance of the dust extraction system and odour control systems.</p>	N/A



DECISION TABLE			
Works Approval / Licence section	Condition number	Justification (including risk description & decision methodology where relevant)	Reference documents
		<p>Condition 16 on the previous licence required any raw material or finished product removed and/or stored in accordance with condition 1 to be re-used, recycled or disposed of to a licensed landfill facility. Condition 1 required spillages of raw materials or finished product outside any building to be cleaned up immediately. The risk of liquid raw materials has been address by condition 1.2.1. The risk of solid raw materials and finished product primarily relates to fugitive dust emissions. DER has assessed the risk of fugitive dust emissions below and the general provisions of the EP Act (e.g. section 49) are sufficient to address the risk.</p> <p>Conditions 1 and 16 on the previous licence have therefore been deleted.</p>	
Emissions general	2.1.1	The licence contains descriptive limits in section 2 therefore condition 2.1.1 has been included.	N/A
Point source emissions to air including monitoring	1.2.1 1.3.1 2.2.1	<p><u>Emission Description</u></p> <p><i>Emission:</i> Gaseous emissions including particulate matter and odour from processing and manufacturing in the Extrusion and Package Shed. Gaseous emissions are extracted and discharged from a 6 m stack. Emissions from the stack are unknown as previous licences have not required stack sampling. DER knowledge and experience with baghouse systems suggest particulate emissions will be <math><50 \text{ mg/m}^3</math> during normal operating conditions.</p> <p><i>Impact:</i> Reduced local air quality and nuisance impacts. Site is in Area A of the <i>Environmental Protection (Kwinana)(Atmospheric Wastes) Policy 1999</i> area which has assigned ambient total suspended particulate (TSP) matter limits. The nearest dwellings are believed to be in excess of 2 km north east in Hope Valley. There are adjacent industrial receptors.</p> <p><i>Controls:</i> A baghouse system collects particulate matter in gaseous emissions from the Extrusion and Package Shed. Odour control solution spray atomisers are present over the oven in the Extrusion and Package Shed and within the exit stack. The exit stack is 6 m tall after being historically heightened for improved dispersion.</p> <p><u>Risk Assessment</u></p> <p><i>Consequence:</i> Minor</p>	<p><i>Environmental Protection (Kwinana)(Atmospheric Wastes) Policy 1999 – Area A ambient TSP criteria</i></p> <p>Licence L6765/1997/11</p> <p>DER Inspection Report for 23/01/2014 – A823940</p>



DECISION TABLE			
Works Approval / Licence section	Condition number	Justification (including risk description & decision methodology where relevant)	Reference documents
		<p><i>Likelihood: Unlikely</i> <i>Risk Rating: Moderate</i></p> <p><u>Regulatory Controls</u> The new licence includes condition 2.2.1 that specifies air extracted from the Extrusion and Package Shed must be discharged via a baghouse and deodorising system to the main exhaust stack. This replaces conditions 3, 6, 10 and 12 in the previous licence.</p> <p>Condition 1.3.1 requires the baghouse or deodorising system (as specified in Table 2.2.1 of condition 2.2.1) to be operating while animal feed manufacturing is occurring within the Extrusion and Package Shed. This replaces conditions 7, 11, 12 and 15 of the previous licence.</p> <p>Condition 1.3.2 requires the licensee to inspect and review the operational performance of the baghouse and deodorising system referred to in Table 2.2.1 (of the licence) at least every 3 months. This replaces the requirements of conditions 8, 9, 13 and 14.</p> <p><u>Residual Risk</u> <i>Consequence: Minor</i> <i>Likelihood: Unlikely</i> <i>Residual Risk Rating: Moderate</i></p>	
Point source emissions to surface water including monitoring	N/A	The premises does not have point source emissions to surface water and there were no conditions on the previous licence. There is no identified change to the risk profile for point source emissions to surface water and no conditions have been added to the new licence.	N/A
Point source emissions to groundwater including monitoring	N/A	The premises does not have point source emissions to groundwater and there were no conditions on the previous licence. There is no identified change to the risk profile for point source emissions to groundwater and no conditions have been added to the new licence.	N/A



DECISION TABLE			
Works Approval / Licence section	Condition number	Justification (including risk description & decision methodology where relevant)	Reference documents
Emissions to land including monitoring	N/A	The premises does not have emissions to land and there were no conditions on the previous licence. There is no identified change to the risk profile for emissions to land and no conditions have been added to the new licence.	N/A
Fugitive emissions	1.2.2	<p><u>Emission Description</u> <i>Emission:</i> Fugitive dust emissions from raw materials. <i>Impact:</i> Local amenity impacts. Nuisance impact. The nearest dwellings are believed to be in excess of 2 km north east in Hope Valley. There are adjacent industrial receptors. <i>Controls:</i> Process enclosure. Raw materials processing and production occurs within closed sheds. The Extrusion and Package Shed has an extraction system via a baghouse. DER photographic records from past inspections shows doorways are fitted with baffles. Photographic records also indicated outdoor areas are either concrete hardstand or bluemetal.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Insignificant <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Low</p> <p><u>Regulatory Controls</u> Condition 5 on the previous licence was a general dust condition to prevent visible dust crossing the boundary. As per DER administrative licence changes as published on its website, this condition has been deleted. Fugitive dust is considered low risk therefore specific fugitive dust controls are not required on the new licence. The general provisions of the <i>Environmental Protection Act 1986</i> (e.g. section 49) are adequate to address the risk of fugitive dust emissions.</p> <p>Due to process enclosure and yard design, fugitive dust emissions are unlikely.</p>	<p>DER Photographic records for inspections on 4 April 2011, 20 July 2010 and 9 February 2010</p> <p><i>Environmental Protection Act 1986</i> – Section 49</p> <p>www.der.wa.gov.au - Administrative changes</p>



DECISION TABLE			
Works Approval / Licence section	Condition number	Justification (including risk description & decision methodology where relevant)	Reference documents
		<p><u>Residual Risk</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Unlikely <i>Residual Risk Rating:</i> Moderate</p>	
Odour (fugitive only)	2.3.1	<p><u>Emission Description</u> <i>Emission:</i> There is a potential for fugitive odour to be emitted from processing areas such as the Extrusion and Package Shed through doorways. <i>Impact:</i> Reduced local air quality. Nuisance impacts. <i>Controls:</i> Doorway baffles and door odour misting systems. The DER inspection report for 23/01/2014 recorded that licensee inspection schedules were sighted and units maintained by a third party</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Moderate</p> <p><u>Regulatory Controls</u> Condition 4 on the previous licence was a general odour condition to prevent unreasonable interference with with the health, welfare and amenity of persons beyond the premises. As per DER administrative licence changes as published on its website this condition has been deleted.</p> <p>Condition 2.3.1 has been included in the new licence requiring operation and maintenance of an odour control misting system on the Extrusion and Package Shed doors. Condition 2.3.1 replaces condition 14 on the previous licence.</p> <p>The Licensee is also required to comply with the general provisions of the <i>Environmental Protection Act 1986</i> (e.g. section 49).</p>	<p><i>Environmental Protection Act 1986 – Section 49</i></p> <p>www.der.wa.gov.au - Administrative changes</p>



DECISION TABLE			
Works Approval / Licence section	Condition number	Justification (including risk description & decision methodology where relevant)	Reference documents
		<p><u>Residual Risk</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Unlikely <i>Residual Risk Rating:</i> Moderate</p>	
Noise	N/A	<p><u>Emission Description</u> <i>Emission:</i> Noise from vehicle movements within the site and also from production machinery within the shed. <i>Impact:</i> Potential breach of assigned noise levels in the <i>Environmental Protection (Noise) Regulations 1997</i> causing a nuisance impact. Site is located within an industrial area surrounded by other industrial businesses. <i>Controls:</i> Process enclosure.</p> <p><u>Risk Assessment</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Moderate</p> <p><u>Regulatory Controls</u> The previous licence did not contain any specific noise conditions. DER is not aware of any recent or historical noise issues attributed to the premises. The Licensee is required to comply with the assigned noise levels in the <i>Environmental Protection (Noise) Regulations 1997</i> which adequately addresses the risk of noise emissions.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Minor <i>Likelihood:</i> Unlikely <i>Residual Risk Rating:</i> Moderate</p>	<p><i>Environmental Protection (Noise) Regulations 1997</i> – assigned noise levels</p>
Monitoring general	N/A	The risk assessment of emissions and discharges has not identified the need for monitoring conditions therefore there are no general monitoring conditions on the new licence.	N/A



DECISION TABLE			
Works Approval / Licence section	Condition number	Justification (including risk description & decision methodology where relevant)	Reference documents
Monitoring of inputs and outputs	N/A	The risk assessment of emissions and discharges has not identified the need for monitoring of inputs and outputs therefore there are no monitoring conditions on the new licence.	N/A
Process monitoring	N/A	The risk assessment of emissions and discharges has not identified the need for process monitoring therefore there are no monitoring conditions on the new licence.	N/A
Ambient quality monitoring	N/A	The risk assessment of emissions and discharges has not identified the need for ambient quality monitoring therefore there are no monitoring conditions on the new licence.	N/A
Meteorological monitoring	N/A	The risk assessment of emissions and discharges has not identified the need for meteorological monitoring therefore there are no monitoring conditions on the new licence.	N/A
Improvements	N/A	The risk assessment of emissions and discharges has not identified the need for improvement conditions therefore there are no monitoring conditions on the new licence.	N/A
Information	3.1.1 - 3.1.4 3.2.1 3.3.1	Section 3.1 (records) specifies the recording and reporting requirements. The Annual Audit Compliance Report (AACR) requirement in condition 18 of the previous has been replaced by condition 3.1.3. The complaints management condition in condition 2 of the previous licence has been replaced by condition 3.1.4 of the new licence. The Licensee is required to submit an Annual Environmental Report (AER) in accordance with condition 3.2.1 in the new licence.	N/A
Licence Duration	N/A	With reference to the <i>Guidance Statement: Licence duration</i> , DER will issue the licence for a period of 20 years.	<i>Guidance Statement: Licence duration</i>



5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration
07/03/2016	Application advertised in West Australian (or other relevant newspaper)	No submissions were received.	N/A
04/02/2016	Application referred to interested parties listed	For the purposes of section 57(2)(b) of the EP Act, there were no direct interest public authorities or persons identified who in DER's view had a direct interest in the subject matter of the application. No direct interest referrals were made.	N/A
30/03/2016	Proponent sent a copy of draft instrument and decision document	The licensee responded in writing on 31/03/2016 advising it had no comments	N/A.



6 Risk Assessment

Note: This matrix is taken from the DER Corporate Policy Statement No. 07 - Operational Risk Management

Table 1: Emissions Risk Matrix

Likelihood	Consequence				
	Insignificant	Minor	Moderate	Major	Severe
Almost Certain	Moderate	High	High	Extreme	Extreme
Likely	Moderate	Moderate	High	High	Extreme
Possible	Low	Moderate	Moderate	High	Extreme
Unlikely	Low	Moderate	Moderate	Moderate	High
Rare	Low	Low	Moderate	Moderate	High