



# Licence

## *Environmental Protection Act 1986, Part V*

**Licensee:** Agri Corp Australia Pty Ltd T/A VMS Contractors

**Licence:** L8526/2011/2

**Registered office:** 382 Ruabon Road  
BUSSELTON WA 6280

**ACN:** 114 710 511

**Premises address:** VMS Contractors  
152 Williamson Road  
HITHERGREEN WA 6280  
Being Lot 1810 on Plan 201688 as depicted in Schedule 1.

**Issue date:** Thursday, 15 May 2014

**Commencement date:** Friday, 23 May 2014

**Expiry date:** Thursday, 22 May 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
67A	Compost Manufacturing and Soil Blending: premises on which organic material (excluding silage) or waste is stored pending processing, mixing, drying or composting to produce commercial quantities of compost or blended solids	1 000 tonnes or more per year	8 000 tonnes per annual period

**Conditions**

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

Date signed: 28 April 2015

.....  
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 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**

#### Location

VMS Contractors (VMS) is a Busselton based company, established in 1955, operating a composting facility (the "premises") at Lot 1810 on Plan 201688 on Williamson Road, off Ludlow-Hithergreen Road in the Shire of Busselton.

#### Environment and receptors

The nearest sensitive premises, a farm residence, is 700 m west of the composting site. There is state forest immediately to the east and crown and timber reserves to the south and southeast respectively. There is a threatened ecological community (TEC) approximately 900 m NE of the premises.

The topography gradually slopes from SE to NW towards the Abba River (minor river) (at 50 m above sea level) which flows through the NW corner of the premises. The Abba River is a permanent waterway and a historical Aboriginal site of significance.

Composting activities occur over 300 m from the river at the closest point and at approximately 60 – 65 m above sea level. There are no groundwater bores on the property; however, bores on surrounding properties show a static water level between 3 and 7 metres AHD.

#### Operations

Over an annual period, the composting process will typically include the following materials:

- 4 000 tonnes of biosolids (sourced from Water Corporation);
- 12 000 tonnes of green waste from Main Roads or Busselton Shire, that comprises of:
  - o Saw dust from local saw mills;
  - o Straw from growers in the south west;
  - o Oat husks from stock feed producer; and
  - o Pine shavings from timber treaters, Greenbushes.

This breaks down to about one third of the amount, producing approximately 5 000 tonnes of compost per annual period, and up to 8,000 tonnes per annual period.

Processing the compost occurs over a 4 – 6 week period. VMS intend that the entire stockpiled product be removed to be spread by mid-autumn each year. The product is used as a soil conditioner for properties owned by VMS or a subsidiary.

#### Amendment

This Licence is the result of an amendment sought by the Licensee to increase the maximum approved capacity for composting production from 5 000 tonnes per annum to 8 000 tonnes per annum. The 5 000 tonnes originally specified on the front page of the licence was underestimated, based on the incoming feedstocks and an assumption that compost would amount to less than 1/3 of the weight of feedstock inputs. In reality, compost produced is close to, and may exceed 5 000 tonnes and as such the Licensee has indicated that an overall maximum of 8 000 tonnes per



annum would better reflect the sites operations. There are no other changes to processes or inputs related to this amendment application.

The licences and works approvals issued for the Premises since 6/01/2011 are:

<b>Instrument log</b>		
<b>Instrument</b>	<b>Issued</b>	<b>Description</b>
W4795/2010/1	06/01/2011	New works approval for new premises
L8526/2011/1	19/05/2011	New licence
L8526/2011/2	15/05/2014	Licence re-issue to REFIRE format
L8526/2011/2	28/04/2016	Licence amendment – to increase approved production capacity from 5,000 tpa to 8,000 tpa.

### **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 1 January until 31 December in the same year;

**'ARI'** means Average Recurrence Interval;

**'AS 4454'** means Australian Standard AS 4454 *Composts, soil conditioners and mulches*;

**'averaging period'** means the time over which a limit is measured or a monitoring result is obtained;

**'biosolids'** means solid material produced by the treatment of sewage (sewage sludge);

**'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](mailto:info@der.wa.gov.au)

**'compost'** means an organic product that has undergone controlled aerobic and thermophilic biological transformation through the composting process;

**'composting'** the process whereby organic materials are microbiologically transformed under controlled aerobic conditions.

**'controlled waste'** has the definition in *Environmental Protection (Controlled Waste) Regulations 2004*;

**'freeboard'** means the distance between the maximum water surface elevations and the top of retaining banks or structures at their lowest point;

**'green waste'** means waste that originates from flora and which does not contain or has not been treated or coated with preserving agents, biocides, fire retardants, paint, adhesives or binders;

**'hardstand'** means a surface with a permeability of  $10^{-9}$  metres/second or less;

**'Licence'** means this Licence numbered L8526/2011/2 and issued under the Act;

**'Licensee'** means the person or organisation named as Licensee on page 1 of the Licence;

**'NATA'** means the National Association of Testing Authorities, Australia;



**'NATA accredited'** means in relation to the analysis of a sample that the laboratory is NATA accredited for the specified analysis at the time of the analysis;

**'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;

**'solid'** means material that:

- (a) has an angle of repose of greater than 5 degrees; and
- (b) does not contain, or is not comprised of, any free liquids; and
- (c) does not contain, or is not comprised of, any liquids that are capable of being released when the waste is transported;
- (d) does not become free flowing at or below 60 degrees Celsius or when it is transported; and
- (e) is generally capable of being moved by a spade at normal temperatures (i.e. is spadeable).

**'unrestricted use'** with reference to compost means compost use where the product is marketed or distributed in bags and in bulk in an unrestricted manner in all market sectors including domestic use, urban landscaping, agriculture and land rehabilitation;

**'usual working day'** means 0800 – 1700 hours, Monday to Friday excluding public holidays in Western Australia;

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

## 1.2 Premises operation

1.1.1 The Licensee shall only accept waste on to the Premises if:

- (a) it is of a type listed in Table 1.2.1; and
- (b) the quantity accepted is below any quantity limit listed in Table 1.1.1; and
- (c) it meets any specification listed in Table 1.1.1.

**Table 1.1.1: Waste acceptance**

Waste type	Quantity limit tonnes/ year	Specification <sup>1</sup>
Biosolids	4 500	Must only be accepted in solid form
Green waste	12 000	None specified

Note 1: Additional requirements for the acceptance of controlled waste are set out in the *Environmental Protection (Controlled Waste) Regulations 2004*.

1.1.2 The Licensee shall ensure that where waste does not meet the waste acceptance criteria set out in condition 1.1.1 it is removed from the Premises by the delivery vehicle or, where that is not possible, stored in a segregated storage area or container and removed to an appropriately authorised facility as soon as practicable.

1.1.3 The Licensee shall ensure that wastes accepted onto the Premises are only subjected to the processes set out in Table 1.2.2 and in accordance with any process limits described in that Table.



Table 1.2.2: Processing of materials		
Waste type	Process	Process requirements
As detailed in Table 1.3.1	Receipt, handling and storage prior to composting	i) Biosolids shall not be stored for longer than 24 hours before being added to the composting process; ii) Oat husks, saw dust and pine shavings shall not be stored for longer than 1 usual working day before being added to the composting process. iii) Green waste, except those mentioned in (i) above, shall not be stored for longer than 21 days before being added to the composting process.
	Treatment by composting	i) The core temperature of the composting pile is maintained between 55°C and 65°C for a period of at least three consecutive days. ii) Moisture level in the composting piles shall be maintained between 45 to 65 per cent. iii) Windrows shall not exceed 2.5 metres high and 3 metres wide. iv) Windrows shall be separated by at least 2 metres of clear ground. v) No more than 8 000 tonnes of compost is produced in any annual period.

1.1.4 The Licensee shall ensure that compost meets the minimum physical, chemical and pathogen requirements set out in Table 1.2.3 prior to sale or distribution to the public for unrestricted use.

Table 1.2.3 Minimum physical, chemical and pathogen requirements for compost prior to sale or distribution to the public for unrestricted use			
Contaminant category	Parameter	Requirement	Units
Pathogens	Faecal coliforms	≤1,000	MPN per gram (dry weight)
	<i>Salmonella spp.</i>	Absent in 50 grams of final product (dry weight)	N/A
	Viable plant propagules	Nil (germination) after 21 days incubation	N/A
Chemical	Arsenic	≤20	mg/kg (dry weight basis)
	Cadmium	≤1	
	Chromium	≤100	
	Copper	≤150	
	Lead	≤150	
	Mercury	≤1	
	Nickel	≤60	
	Selenium	≤5	
	Zinc	≤300	
	DDT/DDD/DDE	≤0.5	
	Aldrin, dieldrin, Chlordane, Heptachlor, HCB, Lindane or BHC	≤0.02 (each)	
PCBs	Not detectable (detection limit 0.2 mg/kg)		
Physical	Glass, metal and rigid plastics	≤0.5	mg/kg (dry weight basis)
	Plastics – light and flexible or film	≤0.05	

1.1.5 The Licensee shall ensure that waste is stored and/or contained within infrastructure in accordance with Table 1.2.4 and that the integrity of the containment infrastructure is maintained.



<b>Table 1.2.4: Containment infrastructure</b>		
<b>Containment area/infrastructure</b>	<b>Material</b>	<b>Infrastructure requirements</b>
Composting hardstand, as depicted in the Premises Map in Schedule 1	Waste types as detailed in Table 1.3.1 being stored and composted; and compost produced	<ol style="list-style-type: none"> <li>1. Bunded hardstand area;</li> <li>2. All runoff drains to the Leachate pond, as depicted in the Premises Map in Schedule 1</li> </ol>
Leachate pond, as depicted in the Premises Map in Schedule 1	Contaminated stormwater and leachate	<ol style="list-style-type: none"> <li>1. Compacted clay lined;</li> <li>2. Uncontaminated stormwater is diverted away from pond;</li> <li>3. A minimum top of embankment freeboard of 300 mm is maintained;</li> <li>4. Capacity to store a 72 hour duration, 1 in 10 year ARI critical rainfall event without overflow; and</li> <li>5. Pond surfaces are kept clear of floating debris and algal mats</li> </ol>

## 2 Monitoring

### 2.1 General monitoring

- 2.1.1 The licensee shall ensure that all laboratory samples are submitted to and tested by a laboratory with current NATA accreditation for the parameters being measured.
- 2.1.2 The Licensee shall ensure that all monitoring equipment used on the Premises to comply with the conditions of this Licence is calibrated in accordance with the manufacturer's specifications.

### 2.2 Monitoring of inputs and outputs

- 2.2.1 The Licensee shall undertake the monitoring in Table 2.2.1 according to the specifications in that table.

<b>Table 2.2.1: Monitoring of inputs and outputs</b>				
<b>Input/output</b>	<b>Parameter</b>	<b>Units</b>	<b>Averaging period</b>	<b>Frequency</b>
Mass of each input listed in Table 1.2.1	Waste type as detailed in Table 1.2.1	Tonnes	Annual period	Continuous (each load arriving at the Premises)
Mass of product produced	Combined compost and blended soils produced			Continuous (each batch produced)
Compost product applied on the Premises	Amount of compost and/or blended soils applied to the Premises	Tonnes	Monthly and annual period	Continuous (each batch applied to the Premises)
		Tonnes/hectare	Annual period	
	All area/s of the Premises on which compost and/or blended soils has been applied	Total hectares of each area	Annual period	
Area extents shown on map				
	Timing of application			





		(month)		
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### 2.3 Process monitoring

2.3.1 The Licensee shall undertake the monitoring in Table 2.3.1 according to the specifications in that table.

<b>Table 2.3.1: Process monitoring</b>					
<b>Monitoring point reference</b>	<b>Process description</b>	<b>Parameter</b>	<b>Units</b>	<b>Frequency</b>	<b>Method</b>
Compost produced for sale or distribution to the public for unrestricted use	Faecal coliforms	MPN per gram (dry weight)	n/a	Each batch produced	As specified in AS 4454
	Salmonella spp.	Presence within 50 grams of final product (dry weight)			
	Viable plant materials and propagules	Presence of germination after 21 days incubation			
	Arsenic	mg/kg (dry weight basis)			
	Cadmium				
	Chromium				
	Copper				
	Lead				
	Mercury				
	Nickel				
	Selenium				
	Zinc				
	DDT/DDD/DDE				
	Aldrin, dieldrin, Chlordane, Heptachlor, HCB, Lindane or BHC				
	PCBs				
Glass, metal and rigid plastics					
Plastics – light and flexible or film					
Compost produced for application on the Premises	Coliphages	pfu per 10 grams	n/a	Each batch produced	None specified
	E. coli	counts per gram			
	Arsenic	mg/kg (dry weight basis)			
	Cadmium				
	Chromium				
	Copper				
	Zinc				
	Dieldrin				
Chlordane					

## 3 Improvements

### 3.1 Improvement program

3.1.1 The Licensee shall complete the improvements in Table 3.1.1 by the date of completion in Table 3.1.1.



- 3.1.2 The Licensee, for improvements not specifically requiring a written submission, shall write to the CEO stating whether and how the Licensee is compliant with the improvement within one week of the completion date specified in Table 3.1.1.

Table 3.1.1: Improvement program		
Improvement reference	Improvement	Date of completion
IR1	The Licensee shall submit to the CEO a report that demonstrates the permeability of the clay liner of the storage pond.	23/11/2014

## 4 Information

### 4.1 Records

- 4.1.1 All information and records required by the Licence shall:
- be legible;
  - if amended, be amended in such a way that the original and subsequent amendments remain legible or are capable of retrieval;
  - except for records listed in 4.1.1(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
  - for those following records, be retained until the expiry of the Licence and any subsequent licence:
    - off-site environmental effects; or
    - matters which affect the condition of the land or waters.

- 4.1.2 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.

- 4.1.3 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.

### 4.2 Reporting

- 4.2.1 The Licensee shall submit to the CEO an Annual Environmental Report within 60 calendar days after the end of the annual period. The report shall contain the information listed in Table 4.2.1 in the format or form specified in that table.

Table 4.2.1: 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 and any environmental incidents that have occurred during the annual period and any action taken	None specified
Table 2.2.1	Monitoring of inputs and outputs <sup>2</sup> for the annual period	None specified
Table 2.3.1	Process monitoring for the annual period, including a summarised comparison of the results against the requirements in Table 1.2.3, where possible.	None specified
4.1.2	Compliance for the annual period	Annual Audit Compliance Report (AACR)



4.1.3	Complaints summary for the annual period	None specified
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Note 1: Forms are in Schedule 2

Note 2: Including a copy of the map showing the areas of compost application

### 4.3 Notification

4.3.1 The Licensee shall ensure that the parameters listed in Table 4.3.1 are notified to the CEO in accordance with the notification requirements of the table.

<b>Table 4.3.1: Notification requirements</b>			
<b>Condition or table (if relevant)</b>	<b>Parameter</b>	<b>Notification requirement<sup>1</sup></b>	<b>Format or form<sup>2</sup></b>
-	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

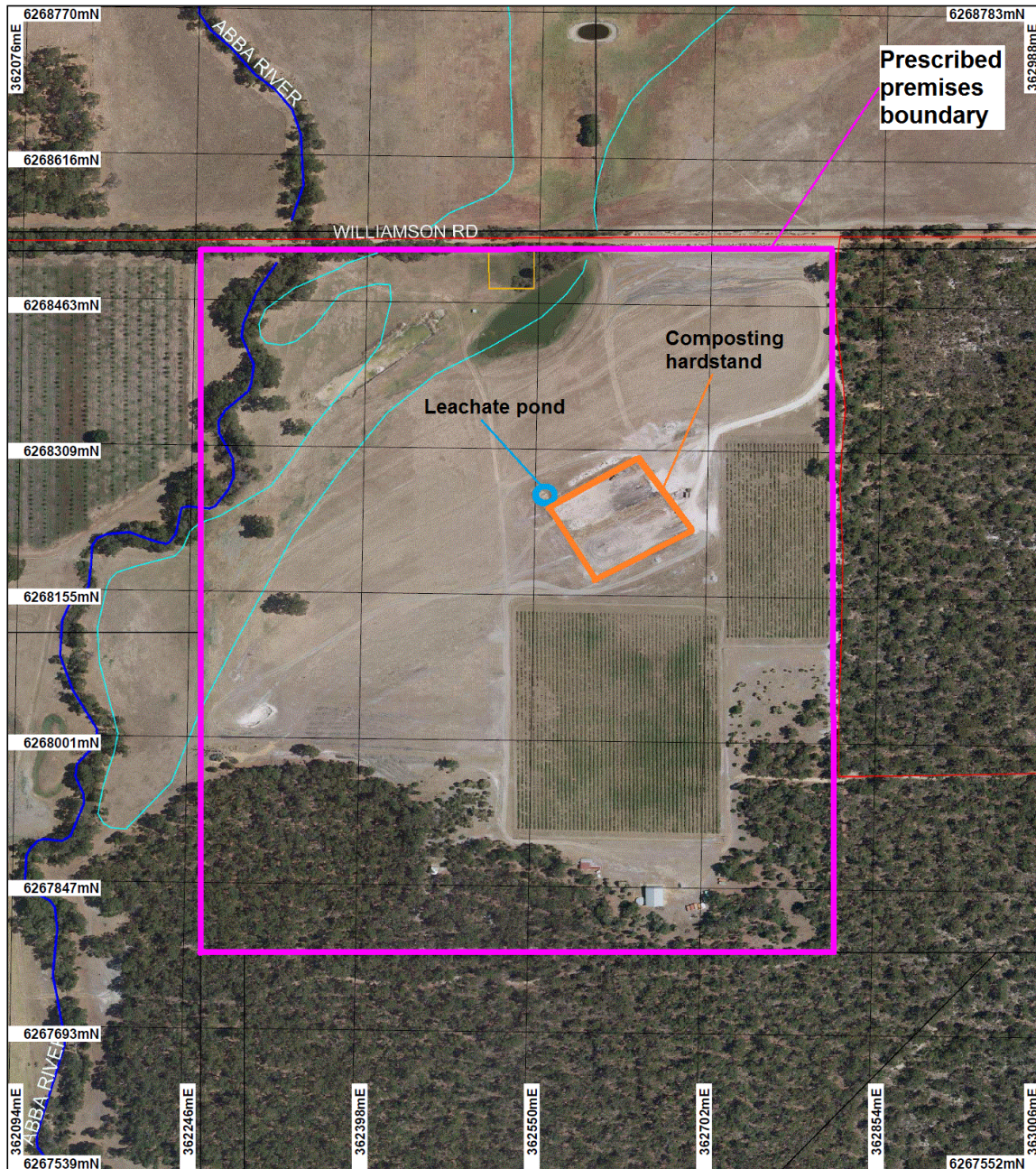
Note 2: Forms are in Schedule 2



# Schedule 1: Maps

## Premises map

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



<b>LEGEND</b>		 Scale 1:5409 (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.
<b>Cadastral</b> <input type="checkbox"/> Freehold <input type="checkbox"/> Crown Reserve <input type="checkbox"/> State Forest / Timber Reserve <input type="checkbox"/> Marine Park (cont)	<input type="checkbox"/> Crown Lease <input type="checkbox"/> Lease / Reserve <input type="checkbox"/> Lease on State Forest / Timber Reserve <input type="checkbox"/> Public Roads <input type="checkbox"/> Unallocated Crown Land (cont)	
<input type="checkbox"/> Water <input checked="" type="checkbox"/> Road Centrelines <input type="checkbox"/> Hydrography, linear <b>Busseton Shire 2014 20cm orthomosaic</b>		Information derived from this map should be confirmed with the data custodian acknowledged by the agency acronym in the legend.  Government of Western Australia Department of Environment Regulation WA Crown Copyright 2002
* 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:	ABN:
Trading as:	
Reporting period: _____ to _____	

#### STATEMENT OF COMPLIANCE WITH LICENCE CONDITIONS

1. 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 B

### DETAILS OF NON-COMPLIANCE WITH LICENCE CONDITION.

Please use a separate page for each Licence condition that was not complied with.

a) Licence condition not complied with:	
b) Date(s) when the non compliance occurred, if applicable:	
c) Was this non compliance reported to DER?:	
<input type="checkbox"/> Yes <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 the 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:	

Each page must be initialled by the person(s) who signs Section C of this 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: L8526/2011/2  
 Form: N1

Licensee: Agri Corp 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	

<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	





## 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 Agri Corp Australia Pty Ltd	
Date	



# Decision Document

## *Environmental Protection Act 1986, Part V*

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**Proponent:** Agri Corp Australia Pty Ltd T/A VMS Contractors

**Licence:** L8526/2011/2

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**Registered office:** 382 Ruabon Road  
BUSSELTON WA 6280

**ACN:** 114 710 511

**Premises address:** VMS Contractors  
152 Williamson Road  
HITHERGREEN WA 6280  
Being Lot 1810 on Plan 201688 as depicted in Schedule 1.

**Issue date:** Thursday, 15 May 2014

**Commencement date:** Friday, 23 May 2014

**Expiry date:** Thursday, 22 May 2036

### **Decision**

Based on the assessment detailed in this document the Department of Environment Regulation (DER), has decided to issue an amended licence. DER considers that in reaching this decision, it has taken into account all relevant considerations.

Decision Document prepared by: Cassie Bell  
Licensing Officer

Decision Document authorised by: Caron Goodbourn  
Delegated Officer



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## 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 type="checkbox"/> Licence amendment <input checked="" type="checkbox"/> Works Approval amendment <input type="checkbox"/>	
Activities that cause the premises to become prescribed premises	<b>Category number(s)</b>	<b>Assessed design capacity</b>
	67A	8 000 tonnes per annual period
Application verified	Date: 16/03/2016	
Application fee paid	Date: n/a	
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 checked="" type="checkbox"/>
Is the Premises within an Environmental Protection Policy (EPP) Area	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Is the Premises subject to any EPP requirements?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

### 3 Executive summary of proposal and assessment

Agri Corp Australia Pty Ltd trading as VMS Contractors (VMS) are a Busselton based company, established in 1955. VMS started off in the viticulture industry then diversified into agriculture and mine rehabilitation. They are also involved in road transport and marine dredging.

#### Premises location

VMS also operate a licensed composting facility (the “premises”) at Lot 1810 on Plan 201688 on Williamson Road, off Ludlow-Hithergreen Road in the Shire of Busselton. The area is primarily a farming community, with occasional sand mining. Lot 1810 is an ex-sand mine that has been rehabilitated back to pasture.

The compost is not bagged or sold but spread within the premises. The land within the premises is predominantly used for beef and pasture production.

#### Environment and receptors

The nearest sensitive premises, a farm residence, is located 700 m west of the composting area. There is state forest immediately to the east and crown and timber reserves to the south and southeast respectively. There is a threatened ecological community (TEC) approximately 900 m NE of the premises.

The topography gradually slopes from SE to NW towards the Abba River (minor river) (at 50 m above sea level) which flows through the NW corner of the premises. The Abba River is a permanent waterway and a historical Aboriginal site of significance.

Composting activities occur over 300 m from the river at the closest point and at approximately 60 – 65 m above sea level. There are no groundwater bores on the property; however, bores on surrounding properties show a static water level between 3 and 7 metres AHD.

#### Operations

Over an annual period, the composting process will typically include the following materials:

- Biosolids – 4 000 tonnes (sourced from Water Corporation);
- 12 000 tonnes of green waste from Main Roads or Busselton Shire, that comprises of:
  - o Saw dust from local saw mills;
  - o Straw from growers in the south west;
  - o Oat husks from stock feed producer; and
  - o Pine shavings from timber treaters, Greenbushes.

This breaks down to about one third of the amount, producing approximately 5 000 tonnes of compost per annual period, and up to 8,000 tonnes per annual period.



Biosolids are sourced from Water Corporation wastewater treatment plants including Bunbury, Busselton, Collie, Kemerton and Margaret River.

Biosolids, oat husks and saw dust are transported directly to the hardstand area and the composting process is started within 24 hours of delivery. Products such as straw (which is in large bales), and green waste may be stored on a hardstand for several weeks before being added to the compost process. VMS Contractors aim to have the site cleared on a regular basis.

There are two composting pads; each 100 m x 100 m. Surrounding the pads is a 600 mm high impervious wall, with a mounded entrance for truck access. A 3 m deep 6 m by 6 m catchment pond collects leachate from the pad via an open drain approximately 2 m long. Both the pad and the catchment pond are bunded and sealed with a clay liner. A sand/gravel mix has been placed on top of the clay liner. The pad has been designed to ensure no waste enters the environment.

Processing the compost occurs over a 4 – 6 week period. A 966 CAT loader is used to unload and turn the windrows. Windrows are a maximum of approximately 2.5 m high and 3 m wide.

VMS intend that the entire stockpiled product be removed to be spread on the Premises by mid-autumn each year.

Due to the acceptance of biosolids, VMS also obtained a Product Approval from DoH in 2011 to produce and publicly distribute compost which met a P1C1 quality in accordance with the Western Australian Guidelines for Biosolids Management (DEC 2012). Despite this, it became apparent that P1C1 was difficult to achieve and consequently in 2013, Water Corporation made a submission to DoH on behalf of VMS for composted biosolids material (P1C2 quality) to be applied to the Hithergreen premises (with reduced monitoring required). Approval was granted for this in September 2013. VMS advised in 2015 that the P1C2 compost continues to be applied to land within the Premises only, in accordance with the DoH approval.

#### Amendment

An amendment has been sought by the Licensee to increase the maximum approved capacity for composting production from 5,000 tonnes per annum to 8,000 tonnes per annum. The 5,000 tonnes originally specified on the front page of the licence was underestimated, based on the incoming feedstocks and an assumption that compost would amount to less than 1/3 of the weight of feedstock inputs. In reality, compost produced may exceed 5,000 tonnes and the Licensee has indicated that an overall maximum of 8,000 tonnes per annum would better reflect the sites operations. There are no other changes to processes or inputs.

The amendment application has been assessed in the Decision Table below. Where changes have been made to the conditions from the previous version of the licence, these are also detailed and justified in the table below. Where there has been no change to the



## 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.

<b>DECISION TABLE</b>			
<b>Works Approval / Licence section</b>	<b>Condition number W = Works Approval L = Licence</b>	<b>Justification (including risk description &amp; decision methodology where relevant)</b>	<b>Reference documents</b>
<b>Interpretation</b>	L1.1.2	Some definitions have been updated within condition 1.1.2, and some new definitions added in accordance with recently issued licences, and as relevant to the condition changes discussed further below.	
<b>General conditions</b>	N/a	<p>The "General conditions" section of the previous version of the licence, and its conditions, have been removed from the licence. These conditions are no longer routinely added to licences.</p> <p>Previous condition 1.2.1 does not need to be specified as it is inherently addressed by the general provisions of the <i>Environmental Protection Act 1986</i>.</p> <p>Previous condition 1.2.2 relating to pollution control and monitoring equipment has been removed as this equipment is not specifically defined under the licence for this particular premises.</p> <p>Previous conditions 1.2.3 and 1.2.4 refer to a code of practice which is administered by the Department of Mines and Petroleum and specifically relates to placard quantities of materials. Any incidents which arise out of inappropriate storage of hazardous materials can be adequately dealt with under the <i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i> without the need for specific licence conditions. All associated definitions were removed from condition 1.1.2.</p> <p>Previous condition 1.2.5 for stormwater management has been removed because it is also adequately covered by the <i>Environmental Protection (Unauthorised Discharges)</i></p>	<p>General provisions of the <i>Environmental Protection Act 1986</i>;</p> <p><i>Environmental Protection (Unauthorised Discharges) Regulations 2004</i></p>



<b>DECISION TABLE</b>			
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		<i>Regulations 2004</i> . Additionally, as detailed in the premises operation section, a requirement to divert clean uncontaminated stormwater away from the leachate pond has been added to Table 1.2.4 which is consistent with the 2011 version of the licence (before it was converted into REFIRE format in 2014). See the Premises operation section for more details.	
<b>Premises operation</b>	L1.2.1 / Table 1.2.1	Table 1.2.1 has been amended slightly from the previous version of the licence, to clarify that biosolids must be received in solid form. The Premises is not licensed as a liquid waste facility, hence can only receive solid wastes for composting. The definition for 'biosolids' in section 1.1 of the licence has also been amended accordingly, and a definition for 'solid' has also been added, sourced from the Landfill Definitions (right). Table 1.2.1 has also been amended to remove the reference to animal effluent or residues from the footnote, due to these not being relevant to the waste types allowed on the premises.	Landfill Waste Classification and Waste Definitions (as amended)
<b>Premises operation</b>	L1.2.3 / Table 1.2.2 and L1.2.4	<p>Table 1.2.2 has been amended from the previous version of the licence, in that a compost production limit of 8,000 tonnes per annual period has been added, for clarity (in addition to the front page of the licence). The increase on the front page of the licence from 5 000 tonnes to 8 000 tonnes does not result in any change to the environmental risk posed by the premises, due to there being no change to process or input quantities which are already set in the licence conditions.</p> <p>The requirement for oat husks, saw dust and pine shavings to be stored for no longer than 24 hours prior to use in composting has been revised on application from the licensee who have advised that this is not possible when the feedstock arrives on a Friday. As such, the condition has been altered such that the feedstock shall not be stored for longer than 1 usual working day, as already defined under the licence. See Odour section for more detail.</p> <p>Additionally, the requirement for compost to meet the requirements in AS 4454 has been removed from Table 1.2.2. The full suite of physical and chemical requirements in AS 4454 is wide-ranging and not all elements will necessarily directly correspond to</p>	AS 4454-2012 <i>Composts, soil conditioners and mulches</i> : Pathogen indicators in table 3.1(A), physical contaminants in table 3.1(B) and chemicals in table 3.1(C).



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		environmental impact. As such, a new condition 1.2.4 / Table 1.2.3 has been added to replace the requirement. Condition 1.2.4 / Table 1.2.3 specifically draws on the major physical, chemical and pathogen requirements from AS 4454 that may be of environmental concern to DER should compost be distributed for unrestricted use. This new condition does not limit the Licensee from continuing to monitor or operate in accordance with the standard generally, but aims to more clearly reflect DER's expectations and continue to reduce the risk to public health and the environment where the final use of the product is uncontrolled.	
<b>Premises operation</b>	L1.2.5 / Table 1.2.4	Table 1.2.4 has been amended from the previous version of the licence, to use the terminology referred to on the premises map in schedule 1 ("composting hardstand" and "leachate pond"). Additionally, as already mentioned in the General conditions section above, requirements for runoff from the composting hardstand to drain to the leachate pond and for clean stormwater to be excluded from the leachate pond have been included. These requirements are added to more clearly reflect the site-specific requirements which condition 1.2.5 on the previous version of the licence (now removed) attempted to achieve. These are therefore not new requirements, but should fit in with the existing design of the premises.	
<b>Emissions general</b>	N/A	Condition 2.1.1 of the previous version of the licence (requirement to investigate limit exceedances in section 2 of the licence) has been removed as part of the amendment, due to there being no relevant limits set.	
<b>Fugitive emissions</b>	N/A	Condition 2.6.1 of the previous version of the licence relating to dust has been deleted. The regulatory effect of the condition is fulfilled by the provisions of Section 49 of the <i>Environmental Protection Act 1986</i> .	Section 49 of the <i>Environmental Protection Act 1986</i>
<b>Odour</b>	L1.2.3	<b>Operation</b> <u>Emission Description</u> <i>Emission:</i> Odour from the storage of feedstocks prior to incorporation into the aerobic composting process <i>Impact:</i> Amenity issues for staff and nearby neighbours (700m distance) to the premises. Potential health impacts in the case of severe or ongoing odour emissions.	Section 49 of the <i>Environmental Protection Act 1986</i>





DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
		<p><i>Controls:</i> The Licensee does not store biosolids for longer than 24 hours prior to incorporating it into the composting process. The licensee previously also incorporated oat husks, saw dust and pine shavings into the composting process within 24 hours of receipt; however as part of this amendment the Licensee has requested this be amended to allow an extra 72 hours to account for loads which may arrive on a Friday.</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 1.2.3 (Table 1.2.2) has been amended to allow the storage of oat husks, saw dust and pine shavings for no longer than 1 'usual working day', instead of 24 hours. It is considered that the overall odour risk change as a result of this is minimal, given that under normal conditions these products will continue to be incorporated within 24 hours as originally approved.            Condition 2.7.1 of the previous version of the licence relating to odour has also been deleted. The regulatory effect of the condition is inherently fulfilled by the provisions of Section 49 of the <i>Environmental Protection Act 1986</i> and therefore there is no benefit to paraphrasing the Act in the licence.</p> <p><u>Residual Risk</u>  <i>Consequence:</i> Minor  <i>Likelihood:</i> Unlikely  <i>Risk Rating:</i> Moderate</p>	
Monitoring general	L2.1.1	Condition 2.1.1 requiring compost samples to be collected in accordance with AS 4454 and sent to a laboratory with NATA accreditation has been amended to remove the requirement for the AS 4454. This requirement is already stipulated within the	



DECISION TABLE			
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		<p>monitoring table 2.3.1 and does not need to be repeated here.</p> <p>Previous condition 3.1.3 relating to discrepancies in calibration requirements has been deleted. The Licensee has not raised any issues with the calibration of monitoring equipment on the premises (such as compost temperature and moisture meters) since the licence was reissued in 2014. It is assumed therefore that this equipment can be calibrated in accordance with the manufacturer's specifications.</p>	
Monitoring of inputs and outputs	L2.2.1 / Table 2.2.1	<p><b>Operation</b></p> <p><u>Emission Description</u>  <i>Emission:</i> Application of compost on the premises which contains contaminants (e.g. heavy metals, pesticides, pathogens) in excess of the local soil capacities due to the use of sewage sludge with high contaminant levels, inappropriate ratios of feedstocks or insufficient processing of waste.  <i>Impact:</i> Local contamination of soils, surface water and groundwater from the use of compost which may have unacceptable levels of heavy metals, chemical residues, pathogens or other contaminants (litter, plastics, etc.).  <i>Controls:</i> The proponent applies compost to the premises at a rate no greater than 12 dry tonnes per hectare in accordance with Department of Health approval. The approximate loading of key heavy metals has been estimated under this scenario and has been deemed suitable by Department of Health based on the WA Biosolids Guidelines.</p> <p><u>Risk Assessment</u>  <i>Consequence:</i> Moderate  <i>Likelihood:</i> Unlikely  <i>Risk Rating:</i> Moderate</p> <p><u>Regulatory Controls</u>            Table 2.2.1 has been amended from the previous version of the licence to clarify the averaging period and frequency and also to add a requirement to monitor the tonnages</p>	



<b>DECISION TABLE</b>			
<b>Works Approval / Licence section</b>	<b>Condition number W = Works Approval L= Licence</b>	<b>Justification (including risk description &amp; decision methodology where relevant)</b>	<b>Reference documents</b>
		<p>and areas on which compost is applied within the premises. This is a new requirement which was not on the previous version of the licence but is intended to give DER basic information on where any compost which is not publicly distributed (and doesn't meet the quality requirements in table 1.2.3) is being applied so basic contaminant loadings can be calculated from year to year.</p> <p>The monitoring and reporting of compost application will not itself directly result in a lowered residual environmental risk; however it will provide further information to enable DER to assess environmental risk of the application on an ongoing basis.</p> <p><u>Residual Risk</u> <i>Consequence:</i> Moderate <i>Likelihood:</i> Unlikely <i>Risk Rating:</i> Moderate</p>	
<b>Process monitoring</b>	L2.3.1 / Table 2.3.1	Table 2.3.1 has been amended from the previous version of the licence such that the blanket reference to AS 4454 has been removed, and replaced with the basic physical, chemical and pathogen parameters that have been listed in Table 1.2.3 for compost intended for unrestricted use, and key chemical and pathogen parameters from the WA Biosolids Guidelines which apply in the case the compost is intended to be applied to land within the Premises. This is in accordance with the Licensees existing agreement with the Department of Health to only apply compost to land on the Premises that meets P1C2 or better quality, in accordance with the guidelines. As mentioned in the Premises operation section above, the previous blanket reference to monitoring in accordance with AS 4454 may not be appropriate as it is wide-ranging and not necessarily directly related to environmental risk.	"Western Australian guidelines for biosolids management", (as amended). Department of Environment and Conservation
<b>Improvements</b>	L3.1.1 – 3.1.2 / Table 3.1.1	It is noted that the improvement condition IR1 has not been removed from Table 3.1.1 as part of this licence amendment despite the due date having passed in November 2014, due to the conditions not being complied with. The condition will remain on the licence until the required report has been submitted.	
<b>Records</b>	N/A	Condition 5.1.2 of the previous version of the licence has been removed, as this	



<b>DECISION TABLE</b>			
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		condition is now considered redundant and is no longer included on licences.	
<b>Reporting</b>	L4.2.1 / Table 4.2.1	Table 4.2.1 for the Annual Environmental Report has been amended for clarity, to specify that the monitoring required to be reported is that relating to the “annual period”. Additionally, a requirement to compare the compost quality monitored to the requirements in Table 1.2.3 of the licence has been included.	
<b>Notification</b>	L4.3.1 – Table 4.3.1	Table 4.3.1 relating to notifications has been amended. The previous requirement to notify DER of any failure/malfunction/incident causing pollution is adequately covered under section 72 of the <i>Environmental Protection Act 1986</i> , hence the notification requirement has been changed so that it is only required when a limit specified in the licence is breached (e.g. the acceptance of more greenwaste than is allowed, the public distribution of compost which did not meet the requirements in table 1.2.3, etc.).	Section 72 of the <i>Environmental Protection Act 1986</i>
<b>Licence Duration</b>	N/A	The licence duration has been extended out to 2036. This is in accordance with DER’s Guidance Statement for Licence Duration. There is no end-date on the planning approval for the facility which should prevent this extension. Although there has not been a recent review of the <i>full</i> environmental assessment for the site, DER is able to initiate a complete review at any time within the extended duration of the licence, should a need be flagged.	Guidance statement: Licence duration: <i>Part V Environmental Protection Act 1986</i> (DER 2014)



## 5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration
5/04/2016	Proponent sent a copy of draft instrument	Page 3 – refers to requiring DoH license; basically you're no longer required to have a DoH license and you can refer to DoH (Clemencia) email on this.	Paragraph deleted from Premises Summary. Contextual/historic information only.
		Table 1.2.2 – cannot stockpile feed products for more than 24hrs; you must be allowed to stockpile / store your other feed materials for > 24hrs otherwise too restrictive and possibly costly to operate. No justification to not allow this	Further clarification sought from Licensee on proposed alternative storage timeframe. Timeframe has been revised to 1 working day in response to this. See justification in Decision Table.
		Page 8 – what the compost must meet - Should be reworded to say if Unrestricted quality is required for end use then ..... If Restricted quality compost i.e. for onsite use then..... An additional column could be added to table 1.2.3 to show concentration. Also parameters listed conflict with WA biosolids guidelines so there seems to be some conflict between which regulation needs to be referenced	No change. The proposed amendment did not seek to set contaminant thresholds for the application of compost to land on the premises, only on compost distributed to public for unrestricted use. The Licensee has already committed to P1C2 quality compost via agreement with Department of Health.
		Page 9 – 2.1.1 should only apply to unrestricted quality. AS4454 do not apply to restricted quality compost.	The requirement to sample in accordance with AS 4454 has been removed. This is already specified in condition 2.3.1 for unrestricted use compost; hence it is considered it doesn't need to be repeated here.
		Page 10 – 2.3.1 again only applies for restricted quality product as the compost is to be used on site.	A second part has been added to the table, for the monitoring of parameters in compost which is applied to land within the Premises. The parameters match those in the WA Biosolids Guidelines, as suggested. It has also been specified that the existing parameters (first part of the table) apply only to compost that is for public distribution/ unrestricted use. See further justification in Decision Table.



## 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