



## Application for Licence

### Part V Division 3 of the *Environmental Protection Act 1986*

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<b>Licence Number</b>	L9211/2019/2
<b>Applicant</b>	A to Z Recycling Pty Ltd
<b>ACN</b>	130 431 917
<b>File Number</b>	DER2019/000339
<b>Premises</b>	A to Z Recycling Lease Area 8 190 Flynn Drive NEERABUP WA 6031  Legal description - Part of Lot 5 on Diagram 91435 As defined by the coordinates in Schedule 1 of the licence
<b>Date of Report</b>	20 December 2021
<b>Proposed Decision</b>	Licence granted

**Jane Dalin**  
**Senior Environmental Officer**  
**Industry Regulation**

*An officer delegated by the CEO under section 20 of the EP Act*

## 1. Application summary

On 1 November 2021, A to Z Recycling Pty Ltd (Licence Holder) applied to renew licence L9211/2019/1 as it is due to expire on 31 December 2021. The Premises is located at Part of Lot 5, Flynn Drive, Neerabup. The licence relates to prescribed premises categories as described below in Table 1.

**Table 1: Premises category description and production design capacity**

Prescribed premises category description (Schedule 1, <i>Environmental Protection Regulations 1987</i> )	Production / design capacity
Category 47- Scrap metal recovery: premises (other than premises within category 45) on which metal scrap is fragmented or melted, including premises on which lead acid batteries are reprocessed.	2,000 tonnes per annual period

The Premises is located within an area zoned as 'industrial development' as defined by the City of Wanneroo District Planning Scheme No. 2. The Premises is situated within 190 Flynn Drive, Neerabup, which has an area of approximately 20 hectares. The property is divided into several leased areas which are occupied by businesses for various other industrial uses. Lease Area 8, which is occupied by the Licence Holder, is approximately 9000m<sup>2</sup> and located on the eastern side of the property.

Scrap metal processed on-site is sold on to larger scrap metal recycling facilities. The Premises primarily receives scrap metal from local government and commercial operators in the form of:

- Heavy scrap metal – structural steel, 10% of wastes received;
- Light scrap metal – fabrication off-cuts from construction and demolition activities, 40% of wastes received;
- Car body shells – sourced from vehicle wrecking yards, 30% of wastes received; and
- Non-ferrous metal – aluminium bull bars and castings, 20% of wastes received.

As part of this application the Licence Holder has requested a reduction in throughput from 8,000 to 2,000 per annual period.

## 2. Regulatory framework

The department has determined to undertake an administrative renewal of the licence and has not conducted a full review and risk assessment of emissions and discharges from the premises in line with the Department's *Work Instruction: Regulatory Services, COVID-19 licensing position* June 2021.

In replacing the licence, the department has considered and given due regard to its regulatory framework and relevant policy documents which are available at <https://dwer.wa.gov.au/regulatory-documents>.

## 3. Decision summary

Under the regulatory framework the Delegated Officer has determined to grant the licence L9211/2019/1 without conducting any additional assessment or risk assessment.

The replacement licence will be issued for four years with an expiry date of 2 December 2025. This is consistent with the *Guidance Statement: Licence Duration 2016* as further statutory approvals (Development Approval) are required for the continued operation of the Premises

following the 2 December 2025 from the City of Wanneroo.

In renewing the licence the Delegated Officer has determined to:

- update the format and appearance of the licence;
- remove redundant conditions;
- include conditions considered necessary for the effective administration of the licence (i.e. record keeping and reporting requirements);
- revise licence conditions and consolidate existing pollution control conditions;
- include all infrastructure into condition 1, *Table 1: infrastructure and equipment requirements*;
- correct clerical mistakes and unintentional errors; and
- transfer all existing regulatory controls and conditions to the renewed licence.

The licence throughput has been reduced from 8000 to 2,000 tonnes per annual period as requested by the Licence Holder. This is based on the actual production provided in the Annual Environmental Report for the 2020 period which confirms actual production was 434 tonnes. No further risk assessment is necessary as it does not change the environmental obligation of the Licence Holder.

As a result of this decision, a renewed Licence L9211/2019/2 has been granted subject to conditions set out in the attached licence and summarised below.

### 3.1 Summary of administrative changes

Section 62 of the EP Act provides general power to impose conditions on licences. All licences are issued with conditions as per *Guidance Statement – Setting Conditions* (October 2015) for the purposes of the EP Act to prevent, control, abate or mitigate pollution or environmental harm.

Table summarises the transfer of all appropriate conditions from the expiring licence into the revised licence including changes made to licence conditions where required and the rationale for changes made.

**Table 2: Summary of changes from Expiring Licence to Revised Licence**

Expiring licence conditions (L9211/2019/1)	Condition summary	Revised licence conditions (L9211/2019/2)	Conversion notes
N/A – Cover page	Licence version, issue and expiry dates.	Licence version and issue date updated. New expiry date: 02/12/2025	Revised to current licensing format.
	Explanatory notes	N/A	Redundant notes - deleted from licence.
	Definitions and Interpretation – Table 1: Definitions	Table 6: Definitions	Revised to current licensing format
	Interpretation	Licence history and Interpretation	Revised to current licensing format
1	Emissions	N/A	Redundant condition - deleted from licence.

8	Waste processing specifications	8	Condition amended to remove date.
9	Waste processing specifications – Shredder floc	N/A	Deleted from licence as this has been completed (refer to A1835460).
12	Infrastructure and equipment	Condition 1	Revised to current licensing format
Schedule 1: Maps	Schedule 1: Maps	Schedule 1: Maps	New naming convention.
Schedule 2:	Primary activities, Infrastructure equipment and Site layout.	Condition 1 Schedule 1- Figure 1	Redundant attachment - deleted from licence due to duplication in licence.

## 4. Consultation

The draft revised licence and this decision report were provided to the licence holder on 8 December 2021 for comment. The licence holder provided a response on the 8 December 2021 and advised they had no further comments and requested the licence to be issued as soon as possible.

## 5. Decision

The Delegated Officer has determined the risks to human health and the environment from the activities on the Premises, and as previously assessed by the Department have not materially changed. The Delegated Officer has determined to grant the renewed licence L9211/2019/2 without conducting any additional risk assessment.