Karratha Scrap Metal Facility

Dodd & Dodd Group Pty Ltd

Licence Application – Supporting Document

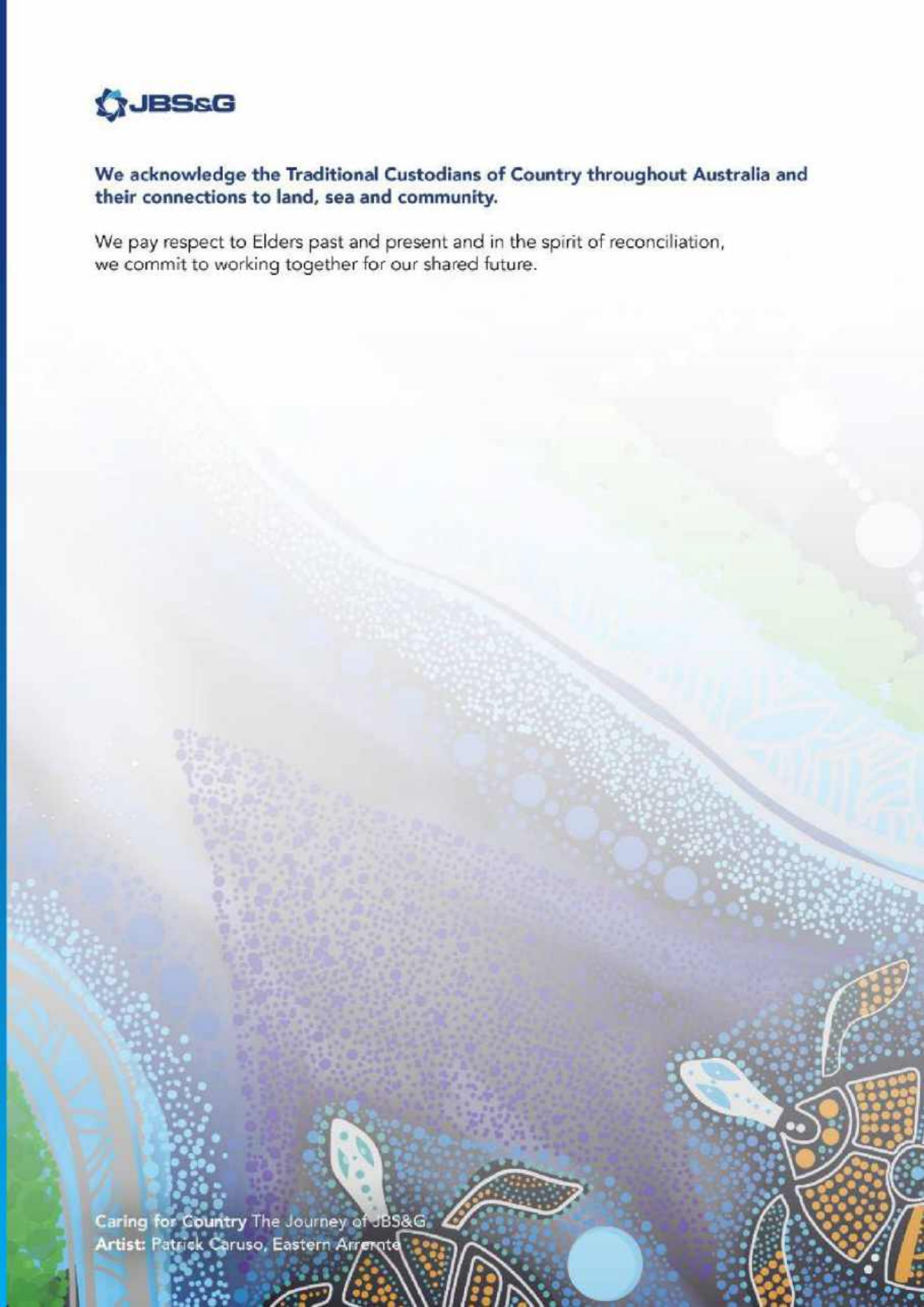
155,077 | 65842 (Rev 0)

29 August 2025

JBS&G

We acknowledge the Traditional Custodians of Country throughout Australia and their connections to land, sea and community.

We pay respect to Elders past and present and in the spirit of reconciliation, we commit to working together for our shared future.



Caring for Country The Journey of JBS&G
Artist: Patrick Caruso, Eastern Arrernte

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1. Introduction

1.1 Background

Dodd & Dodd Group Pty Ltd (C.D. Dodd; the applicant) is a leading provider of mine site demolition and scrap metal recycling in Western Australia, specialising in mine site decommissioning, site clean-ups, battery recycling and commercial scrap metal recycling. C.D. Dodd has operations in Perth (Forrestfield), Karratha, Port Hedland, Onslow and Kalgoorlie. The Karratha facility is located on Lot 109 Bedrock Turn, Karratha (the premises) within the Gap Ridge Industrial Estate.

In July 2023, DWER notified C.D. Dodd that it was aware that the Kalgoorlie facility appeared to trigger the requirement to obtain a licence under section 56 of the *Environmental Protection Act 1986* (EP Act) as Category 47: Scrap metal recovery and/or Category 62: Solid waste depot premises. C.D. Dodd has reviewed the activities carried out all its facilities and has identified that a new licence is also required for the Karratha facility.

The premises includes the following operational areas:

- Scrap Metal Yard;
- Processing Yard and Material Separation Shed; and
- Decontamination Yard.

An indicative layout of the premises is shown in Figure 1-1 below.

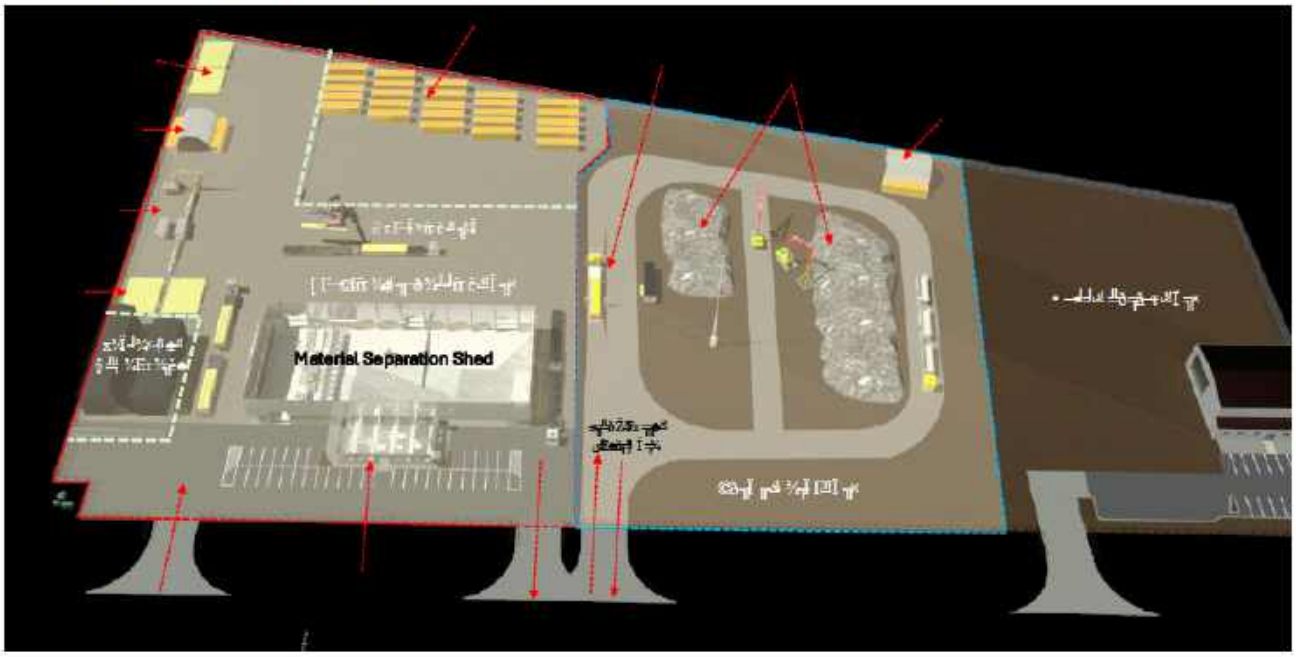


Figure 1-1: Premises layout (provided by C.D. Dodd)

1.2 Purpose and Scope

This document together with the completed Department of Water and Environmental Regulation (DWER) application form constitutes a licence application under Part V of the EP Act. Table 1-1 provides an overview of the application form supporting attachments and the relevant sections of this document that address each item.

Table 1-1: Application attachments

Application Form attachments	Attached
Attachment 1A: Proof of occupier status	Yes
Attachment 1B: ASIC company extract	Yes
Attachment 1C: Authorisation to act as a representative of the occupier	Not applicable
Attachment 2: Premises map/s	Yes
Attachment 3A: Environmental commissioning plan	Not applicable
Attachment 3B: Proposed activities	Section 2
Attachment 3C: Map of area proposed to be cleared (only applicable if clearing is proposed)	Not applicable
Attachment 3D: Additional information for clearing assessment	Not applicable
Attachment 4: Marine surveys (only applicable if marine surveys included in application)	Not applicable
Attachment 5: Other approvals and consultation documentation	Not applicable
Attachment 6A: Emissions and discharges	Section 3
Attachment 6B: Waste acceptance	Section 2.2 and 2.4
Attachment 7: Siting and location	Section 4
Attachment 8: Additional information submitted *Attachment 8A*	 *Plastic shredders specification sheets*
Attachment 9: Category-specific checklist(s)	N/A
Attachment 10: Proposed fee calculation	Yes
Attachment 11: Request for exemption from publication	N/A

1.3 Prescribed Activities

The premises comprises the following prescribed premises categories as listed in Schedule 1 of the Environmental Protection Regulations 1987 (Table 1-2).

Table 1-2: Prescribed premises categories

#	Category	Description	Production or design capacity threshold	Premises capacity
47	Scrap metal recovery	Premises (other than premises within category 45) which metal scrap is fragmented or melted, including premises on which lead acid batteries are reprocessed, 100 tonnes or more per year.	100 tonnes or more per year	40,000 tonnes per year
61A	Solid waste facility	Premises (other than premises within category 67A) on which solid waste produced on other premises is stored, reprocessed, treated, or discharged onto land.	500 tonnes or more per year	20,000 tonnes per year

1.4 Applicant Details

The applicant's details are shown in Table 1-3 below and the ASIC company extract is contained in Attachment 1B.

Table 1-3: Applicant details

Detail	Response
Applicant name:	Dodd & Dodd Group Pty Ltd
Trading as:	C.D. Dodd Scrap Metal Recyclers
ACN:	009 238 671

[redacted]

1.5 Premises Details

The premises details are summarised in Table 1.4 below, and the location is shown on the Premises Map in Attachment 2.

Table 1-4: Premises details

Aspect	Details
Premises name:	Karratha Yard
Site description:	Part of Lot 109 on Plan 075061 Certificate of Title: 28132 Land ID number: 261
Site address:	109 Bedrock Turn, Gap Ridge 6714
Occupier status:	Title holder
Local Government Authority area:	Karratha

1.6 Occupier Status

The premises is owned by the applicant through Bedrock Property Group Pty Ltd (ACN 603 348 554). A copy of the Certificate of Title and ASIC company extract for Bedrock Property Group is provided in Attachment 1A.

1.7 Other Approvals

1.7.1 Development Approval

The premises is in the 'Industrial Development' zone under the City of Karratha Local Planning Scheme No.8[1] (LPS 8), and in the area defined by the Gap Ridge Industrial Estate Structure Plan.[2]

The use of the land is classed as 'Industry-Noxious, which is defined in LPS 8 as an industry that is subject to licensing as 'Prescribed Premises' under the EP Act.

The premises is in the 'Zone B Industrial Precinct' and 'Noxious-Use Sub Precinct' of Gap Ridge Industrial Estate. The industrial precinct is intended for activities that generally require large areas or have significant impacts that require buffering to adjoining uses. Noxious uses are only be permitted within the 'Noxious Use' sub-precinct, located at the southern end of the estate. The Noxious Use Sub-Precinct allows for the clustering of high impact industrial uses so that they can benefit from co-location with similar or related activities within

[1] Karratha Scheme Text
[2] Gap Ridge Industrial Estate Development Plan - WAPC Reference SPN 0402M-1

the Gap Ridge Industrial Estate, whilst being separated to an acceptable level to avoid land use conflict with low impact uses.

1.7.2 Radiological Council

C.D. Dodd will apply to register the premises for the storage and handling of radioactive substances (surface contaminated objects) under the *Radiation Safety Act 1975* for the proposed decontamination activities carried out at the premises. The decontamination activities will be supervised by an approved radiation safety officer and carried out under a Radiation Management Plan, which will be approved by the Radiological Council.

1.7.3 Dangerous Goods

If required, C.D. Dodd will apply for a dangerous goods site licence from the Department of Energy, Mines, Industry Regulation and Safety (DEMIRS) to store cleaning chemicals for use in the decontamination activities.

2. Premises Activities

2.1 Prescribed Premises Infrastructure and Equipment

Table 2-1 provides the list of infrastructure and equipment within the boundary of the premises relevant to this application.

Table 2-1: Infrastructure and equipment

Location on Premises Layout Plan	Infrastructure and equipment	Relevant categories	Critical containment infrastructure	Environmental commissioning	Operational requirement
Whole of premises	Signage	47, 61A	No	No	Must have a clear visible sign at the entrance of the premises specifying: • "No Asbestos" • Hours of operation; and • Contact telephone number(s).
	Fencing and gates	47, 61A	No	No	• Must be maintained to prevent unauthorised access to the site. • Entrance gates to the premises must be securely locked when the premises is unattended.
	Weighbridge	47, 61A	No	No	Must be calibrated in accordance with manufacturer's specifications.
	Premises roads, pavement, work areas and driveways	47, 61A	No	No	Must be wet down as required to minimise dust emissions.
	On-site fire management and prevention equipment	47, 61A	No	No	• Must be stored so access is not impeded by infrastructure or equipment. • Must be maintained in good working order.
	Spill kits	47, 61A	No	No	Must be maintained in good condition.
	Mobile plant	47, 61A	No	No	• Must be maintained in good working order in accordance with manufacturers specifications. • Must be fitted with broadband reversing alarms. • Must be operated in a manner that ensures related noise emissions comply with *Environmental Protection* (Noise) *Regulations 1997*.
Scrap Metal Yard	Oxy-cutting area	47	No	No	Area must be kept free of combustible materials, including vegetation and organic litter.
Processing Yard and Material Separation Shed	Flat rack storage area	61A	No	No	Only clean, uncontaminated items must be stored in the area.
	Multi-wire cutting saw and flowline cutting saw	61A	No	No	• Must be maintained in good working order in accordance with manufacturers specifications. • Must be operated in a manner that ensures related noise emissions comply with *Environmental Protection* (Noise) *Regulations 1997*. • Cooling water must be treated (filtered) before reuse.

Location on Premises Layout Plan	Infrastructure and equipment	Relevant categories	Critical containment infrastructure	Environmental commissioning	Operational requirement
	Material separation building	61A	No	No	Enclosed building with concrete floor.
	Material separation line and shredders	61A	No	No	Must be in enclosed Material Separation Building
	Material storage bins	61A	No	No	Integrity of bins must be maintained.
Decontamination Yard	Ground liners	61A	No	No	Integrity of liner must be maintained.
	Secondary containment (portable and collapsible bunds)	61A	No	No	• Integrity of bunds must be maintained. • A minimum height of 100 mm must be maintained for portable and collapsible bunds. • Bunds must be sized to contain more than 125% of the volume of the largest container stored within the bunded area. • Liquid contaminated with spills or leaks of environmentally hazardous material must be contained within bunds and not discharged to the environment.
	Contaminated item storage area	61A	No	No	• Must be in a bunded area on top of a ground-liner (note only ends of pipes are stored over bunds). • Chemicals required for use in decontamination activities must be stored within a bunded area. • All wastewater generated from decontamination activities must be stored within a bunded area. • Wastewater must only be reused where it has been successfully filtered to less than 1 micron.
	Wastewater treatment infrastructure	61A	No	No	• Must be located in bunded area on top of a ground-liner. • All pipework and filters must be maintained in good working order.
	NORM and mercury waste storage area	61A	No	No	• Must be located in bunded area on top of a ground-liner. • Integrity of storage vessels and containers must be maintained.
	Chemical storage containers	61A	No	No	• Must be located in a bunded area on top of a ground-liner. • Integrity of storage vessels and containers must be maintained.

2.2 Scrap Metal Yard

2.2.1 Waste Acceptance

The premises accepts up to 40,000 tonnes of scrap metal per year from the broader Karratha area and Pilbara region, which is transported to the premises using the applicant's own fleet or by external customers. Most material is delivered in small rigid trucks to heavy combination vehicles.

Clear traffic management plans are in place to accommodate truck movements and mobile plant equipment. Speed limits for the premises are 10 km per hour for trucks and mobile plant, and 5 km per hour for forklifts. Vehicles must give way to mobile plant and equipment. Vehicle access to the premises is via Bedrock Turn. Light vehicles and cars enter a separate gate to the car parking and site office area only.

The premises accepts and processes the following waste types (Table 2-2). The quantities accepted in 2023 as reported under the Waste Avoidance and Resource Recovery Regulations 2008 (WARR Regulations) are also provided for context.

Table 2-2: Waste acceptance

Waste type	Maximum rate at which waste is received	Acceptance specification	Waste accepted 2024 (tonnes)
Ferrous metal	40,000 tonnes per year	• Scrap metal, including but not limited to: o Machinery o Drill rods o Light gauge (mixed) scrap o Heavy gauge steel o Non-ferrous metals. • All materials received at the premises must be inspected for non-conforming waste, including but not limited to Liquified Petroleum Gas (LPG) cylinders, oxygen cylinders, acetylene cylinders (or other compressed gas cylinders), and chemical, hazardous, flammable, radioactive or explosive substances. • All non-conforming waste must be removed prior to further processing. • Any item that is suspected of containing asbestos must be removed prior to further processing. • All items that may have contained gasses must be de-gassed. • Vehicle bodies must be depolluted and contain no gases or liquids. • No items containing environmentally hazardous liquids must be accepted.	23,504
Non-ferrous metal (aluminium)			60
Non-ferrous (other)			140
Mixed construction and demolition waste			35
Lead acid batteries	500 tonnes per year	• No other hazardous waste accepted.	169
Inert Waste Type 2 - used tyres	100 tyres at any one time	• Whole tyres only.	N/A

The premises is generally open from 06:00-16:00 Monday to Friday. However, nighttime (i.e., 24 hour) and weekend operations are sometimes needed to meet customer and export shipping requirements.

All waste deliveries are accepted at the weighbridge and inspected and weighed. Unauthorised loads are removed from the premises by the delivery vehicle or are stored in a quarantine area or container that prevents waste being discharged to the environment before being removed to an appropriately authorised facility within 21 days. Accepted loads are directed to the designated storage are for unloading.

Batteries accepted at the premises are stored on pallets at the workshop. Tyres encountered during the acceptance of scrap metal are stored in skip bins close to the workshop.

The premises does not accept packaged liquid waste. If liquid waste is identified during initial waste acceptance, the load is rejected from the site. However, some intermediate bulk containers (IBCs) are maintained on-site to store any small amounts of liquid (e.g., oils, hydrocarbons) discovered in accepted scrap metal items during handling/processing (i.e., liquids not identified during the initial waste inspection on arrival).

IBCs containing liquid waste are held on bunded pallets in the workshop pending removal from the site. The site will typically hold up to ten IBCs at any one time. Note that empty IBCs may be accepted for scrap (i.e., the IBC metal cage).

2.2.2 Waste Processing

Scrap metal processing operations at the premises include:

- Size reduction by shearing, predominantly using hydraulic shears mounted on excavator booms, and oxy-cutting;
- Sorting to separate unsuitable materials, waste materials, ferrous and non-ferrous metals; and
- Stockpiling of correctly sized ferrous and non-ferrous metals.

Stockpiling of scrap occurs in the Scrap Metal Yard, which comprises ripped and compacted natural ground. Scrap metal stockpiles are maintained with a maximum height of 20 m and separation distance of 5 m between each other and 4 m to the premises boundary (zero where the boundary comprises a solid non-combustible barrier).

Bulk scrap metal (ferrous and non-ferrous) is stored on the ground in the external yard area. Smaller, higher value non-ferrous metals (e.g., copper) are stored in containers.

Processed scrap metal and stored batteries and tyres are despatched off-site by truck for recycling. Ferrous and non-ferrous metals are exported internationally for recycling. Batteries are recycled in Perth or inter-state, and tyres are recovered in Perth. Other residual wastes are disposed to local or Perth-based facilities.

Stormwater from the scrap metal storage areas collects in the low points in the yard, which are kept clear, where it soaks to ground or evaporates.

Waste processing activities carried out at the premises are described in Table 2-3.

Table 2-3: Waste processing (Scrap Metal Yard)

Waste type	Process	Process specification
Scrap metal	Receipt, handling, sorting, size reduction and storage prior to removal off-site	• Stockpiles must not exceed 20 m in height at any point from the base of the stockpile. • Stockpiles must not exceed 20 m in width and 50 m in length. • 5 m clearance must be maintained between stockpiles. • 4 m clearance must be maintained around the waste (zero where the boundary comprises a solid non-combustible barrier). • Any liquid residues in waste received at the premises must be collected and contained within an impervious container in a manner that prevents mixing of incompatible wastes prior to disposal off site to an appropriately licensed facility.

Waste type	Process	Process specification
All scrap metal (ferrous and non-ferrous)	Oxy cutting	• No hot works occur within 10 m of flammable materials. • Hot works cease immediately if visible smoke is observed crossing over the boundary of the premises. • Where practicable, all non-metal surface coatings (including but not limited to plastic, resin, paint, rubber, concrete, synthetic coatings) are removed from the work surface of a scrap metal item, prior to hot works. • Waste residues, e.g., hydrocarbons, petrol and other chemicals, contained in impermeable containers in workshop or on concrete hardstand area for off-site recovery or disposal. • Prior to any oxy-cutting activities, the area is wetted down to reduce the risk of ignition from sparks and/or molten metal. • Oxy-cutting area is kept free of vegetation and litter. • Any combustible materials that cannot be removed from the surrounding area are covered using suitable guards or material during cutting activities
Lead acid batteries	Receipt, handling and storage	Must be stored in sealed containers.
Inert Waste Type 2 - used tyres	Receipt, handling and storage	• No more than 100 tyres must be stored at the premises at any one time. • Must be stored in a non-combustible container.

2.3 Decontamination Yard

C.D. Dodd proposes to use the premises to store decommissioned pipes and to store and clean decommissioned structures (e.g., from the offshore and onshore oil and gas industry) that can contain naturally occurring radioactive material (NORM), hydrocarbon residue, mercury and marine growth. The decommissioned pipes will be stored pending removal off-site for decontamination and scrapping at a suitably licensed premises (e.g., at C.D. Dodd's Onslow Yard) and structures that have been decontaminated on-site will be scrapped by in the Scrap Yard Area as described in Section 2.2.

Decommissioned pipes and structures will be transported to the premises by road. The pipes and structures accepted at the premises can be potentially contaminated by:

- NORM – radium amalgamation and diffusion into scale;
- Mercury – elemental and compound residues resulting from process equipment contamination and amalgamation with internal scaling;
- Hydrogen sulfide (H_2S) – residual product hazard absorbed or trapped within sludge, scale or corrosion by-products from sour service systems;
- BTEX (benzene, toluene, ethylbenzene and xylene) compounds – residual volatile organics adsorbed onto oily sludge, tank residues or pipeline debris; and
- Marine growth – biological fouling material potentially hosting pathogenic organisms and entrained contaminants including heavy metals and hydrocarbons.

2.3.1 Waste Acceptance

Contaminated items will be accepted at the premises in accordance with the specification shown in Table 2-4.

Table 2-4: Waste acceptance

Waste type	Rate at which waste is received	Acceptance specification
Decommissioned pipes and structures	20,000 tonnes per annual period	Contaminated items must be stored in a bunded area

All potentially contaminated items received at the premises are supplied with a unique identification number, which is used for the life of the item through the decontamination and scrapping process. Each item is tracked through a register that records details of the item, including results of contamination screening carried out offshore, storage locations, waste acceptance testing, and decontamination clearance testing and certification.

Pipes and structures known to have contained potentially contaminating substances are inspected and surveyed in accordance with Table 2-5 to determine if the item is contaminated.

Table 2-5: Contamination inspection/survey criteria and trigger levels

Criteria	Method	Trigger Levels
Surface contamination (SCO)	Contamination meter	≥0.2 Bq/cm^2
Surface gamma dose rate	Gamma radiation monitoring	Above twice reference background (BG) (µSv/h)
Workplace exposure standards for elemental mercury (vapour) 8-hour exposure	Mercury vapour monitor	≥12.5 µg/m^3
Surface mercury contamination	Portable XRF monitor	≥MDL (≥90 ppm) ≥2 µg/cm^2
Workplace exposure standards for hydrogen sulfide (8-hour exposure)	H_2S gas monitor	≥5 ppm
Workplace exposure standards for VOC and BTEX (benzene)	Photoionization detector	≥0.5 ppm VOC ≥0.5 ppm benzene

2.3.2 Waste Processing

Items accepted at the premises are processed in accordance with the requirements in Table 2-6.

Table 2-6: Waste processing (Decontamination Yard)

Waste type	Process	Process specification
Decommissioned pipes	Storage only pending processing off-site	• Contaminated pipes must be stored in the contaminated item storage area in the Decontamination Yard. • Open ends of pipes must be plugged or covered before being moved outside the contaminated item storage area.
Decommissioned structures	Decontamination / cleaning activities	• Contaminated structures must be stored in the contaminated item storage area in the Decontamination Yard. • Washing of structures contaminated with marine growth cleaned must not allow contaminated material to be discharged to the environment. • All chemicals used for decontamination must be stored in a bunded area. • All wastewaters must be contained in an impermeable container and stored in a bunded area.

Waste type	Process	Process specification
Wastewater generated from decontamination activities	Wastewater treatment	• Wastewater must only be treated within wastewater treatment infrastructure. • Solid particulates must be removed using settling drum and filters. • Wastewater must only be reused where it has been filtered to less than 1 micron. • Treated wastewater must only be reused for decontamination processes. • Where wastewater cannot be filtered to less than 1 micron or treated for reuse, it must be removed off-site for disposal at a licensed facility.

The decontamination process uses chemicals to dissolve and break the scale interface within the structures and libertate the scale. Elemental and compound mercury released in the scale is stabilised into an insoluble compound and sequestered in the cleaning solution. The chemical prevents the mercury in solution from redepositing (i.e., the conversion is irreversible).

Chemical cleaning is typically not required as the NORM is deposited in the form of barite scales, which are chemically insoluble and amenable to high pressure water jetting. However, some softer barite scales are amenable to chemical cleaning, which may be used where high pressure water jetting is not practicable.

The dislodged scale and stabilised mercury are then captured by filtration in a wastewater treatment unit.

Contaminated items are decontaminated as follows:

- Marine growth on structures with contaminated components in them is washed off in the item's storage bund (note, the contamination present in these items is sealed within the structures and is not impacted by the washing); and
- The structures are connected in-situ to a closed-loop decontamination circuit and flushed with water and chemicals.

This process is carried out using temporary bunds, IBCs, pumps and cleaning connectors and lances. The cleaning lance is inserted into and connected to the structures in a manner that prevents leaks and spills of chemicals and water, recirculating them in a closed loop. The contaminated items and IBCs for water, chemicals and wastewater are stored in bunds.

Chemicals not being used for cleaning are stored in a bunded shipping container.

Once an item of decommissioned infrastructure has been decontaminated, it is tested in accordance with Table 2.7 to ensure that contamination is below the relevant clearance level. Items meeting the clearance levels are certified as decontaminated and moved to the Scrap Yard Area for scrapping as described in Section 2.2.

Table 2.7: Decontamination acceptance criteria and testing methods

Criteria	Equipment	Clearance level
NORM Surface Contamination	Contamination Meter	<0.2 Bq/cm² above BG
NORM Surface Gamma Dose Rate	Gamma Survey Meter	<2 x BG (µSv/h)
Mercury Vapour (Elemental)	Mercury Vapour Monitor	<0.012 mg/m³
Elemental Mercury (Liquid)	Visual	None
Mercury in Scale and Surface Bound Mercury	Portable XRF (surface measurement)	<MDL (<90 ppm) <2 µg/cm²
Hydrogen Sulphide (H_2S)	H_2S gas monitor	<5 ppm
Benzene (BTEX)	Photoionization detector	<0.5 ppm

2.3.3 Wastewater Treatment

Wastewater generated through the decontamination processes requires treatment prior to reuse. All wastewater is collected in IBCs or other containers prior to undergoing a series of treatment steps to remove the different contaminants that may be present, including:

- Solid particulate removal using settling drum and particulate filters (down to 1 µg);
- Separation of oil and grease using absorbent filters and skimming;
- Chemical neutralisation to bring the water to a neutral pH range; and
- Further advanced treatment to remove specific contaminants, where methods will be chosen to target each identified contaminant and their effectiveness for removal.

Where wastewater cannot be reused in the cleaning process, it is stored in impermeable, leak-free IBCs or equivalent containment vessels within a bunded area in the Decontamination Yard prior to disposal off-site to a suitably licensed facility. Wastewater removed from the premises is tested to ensure it meets the relevant acceptance criteria for the facility proposed to accept the waste.

Waste NORM and mercury solids removed by the decontamination processes are stored in lined, sealed UN-rated drums in a lockable steel container in the Decontamination Yard.

2.4 Processing Yard and Material Separation Shed

The premises receives flexible pipes (flowlines) and umbilical cables (sub-sea assets) that have been recovered from offshore decommissioned hydrocarbon fields and decontaminated at other suitably licensed premises (e.g., at C.D. Dodd's Onslow Yard operating under Licence L2963/2025/1).[3]

The flexible pipes and umbilicals are made up of several layers of different materials, including metal cable, plastic sheaths and coatings, and armour wire. C.D. Dodd has designed and installed processes to deconstruct the pipes and umbilicals and separate out the different materials for recovery, as described in the following sections.

2.4.1 Waste Acceptance

The premises accepts and processes the following waste types (Table 2-8).

Table 2-8: Waste acceptance

Waste type	Maximum rate at which waste is received	Acceptance specification
Decontaminated flexible pipes and umbilical cables	20,000 tonnes per year	Decontaminated items only

The flowlines and umbilicals are delivered to the premises by road in bundles of approximately 12 m lengths. The bundles are unloaded by forklift truck and placed onto flat racks for storage pending processing.

2.4.2 Waste Processing – Flexible Pipe Deconstruction Process

The flexible pipe deconstruction process involves three stages:

1. De-tension cut and cut to length.
2. Material separation.
3. Plastic shredding.

[3] Licence L2963/2025/1

The process flow diagram of the umbilical destruction process is provided in Figure 2-7 and the following sections provide a description of each stage. Photographs of the process are shown on Figure 2-1.

Flexible pipe being de-tension by cutting

Figure 2-1: Material separation line photographs

2.4.2.1 Cutting

The individual lengths of approximately 12m long flexible pipe are placed onto a roller table where an automated band saw cuts it into 2.4 m lengths. The 2.4 m lengths are then de-tensioned with a longitudinal cut to expose the individual layers. The de-tensioned sections are collected in a bin and taken into the Material Separation Shed where the materials are separated (indicative layout shown in Figure 2-2).

The cutting saws use water to cool the cutting blades with a closed-loop system that collects the water, discharges it through a treatment system (filtration) and stores it in plastic water tanks for re-use.

Figure 2-2: Material separation line schematic (indicative layout)

2.4.2.2 Material Separation

Material separation takes place in the Material Separation Shed, which is a 67.5 m x 5.5 m x 10 m high enclosed building with concrete floor (2,010 m^2 total floor area). The 2.4 m lengths of flexible pipe are separated using an excavator and clamshell grab, and the individual materials are placed into separate storage bins:

- Super Duplex (stainless steel);
- Armour wire;
- Recyclable plastic; and

- Non-recyclable material.

The separated material is stored in the Processing Yard and Material Separation Shed pending removal off-site for recovery or disposal either directly or through the Scrap Yard.

2.4.2.3 Plastic Shredding

The recovered plastics from the flexible pipes are light and relatively bulky, making transportation by road inefficient and costly. Therefore, C.D. Dodd intends to install two shredders to fragment and 'chip' the plastic making it easier and more efficient to transport:

- Initial shredding down to ~25 mm size; and
- Secondary shredder down to ~12mm size.

Specification sheets for the proposed shredders are provided in Attachment 8A.

The shredded plastic will be stored on-site pending recovery at an appropriately licensed facility.

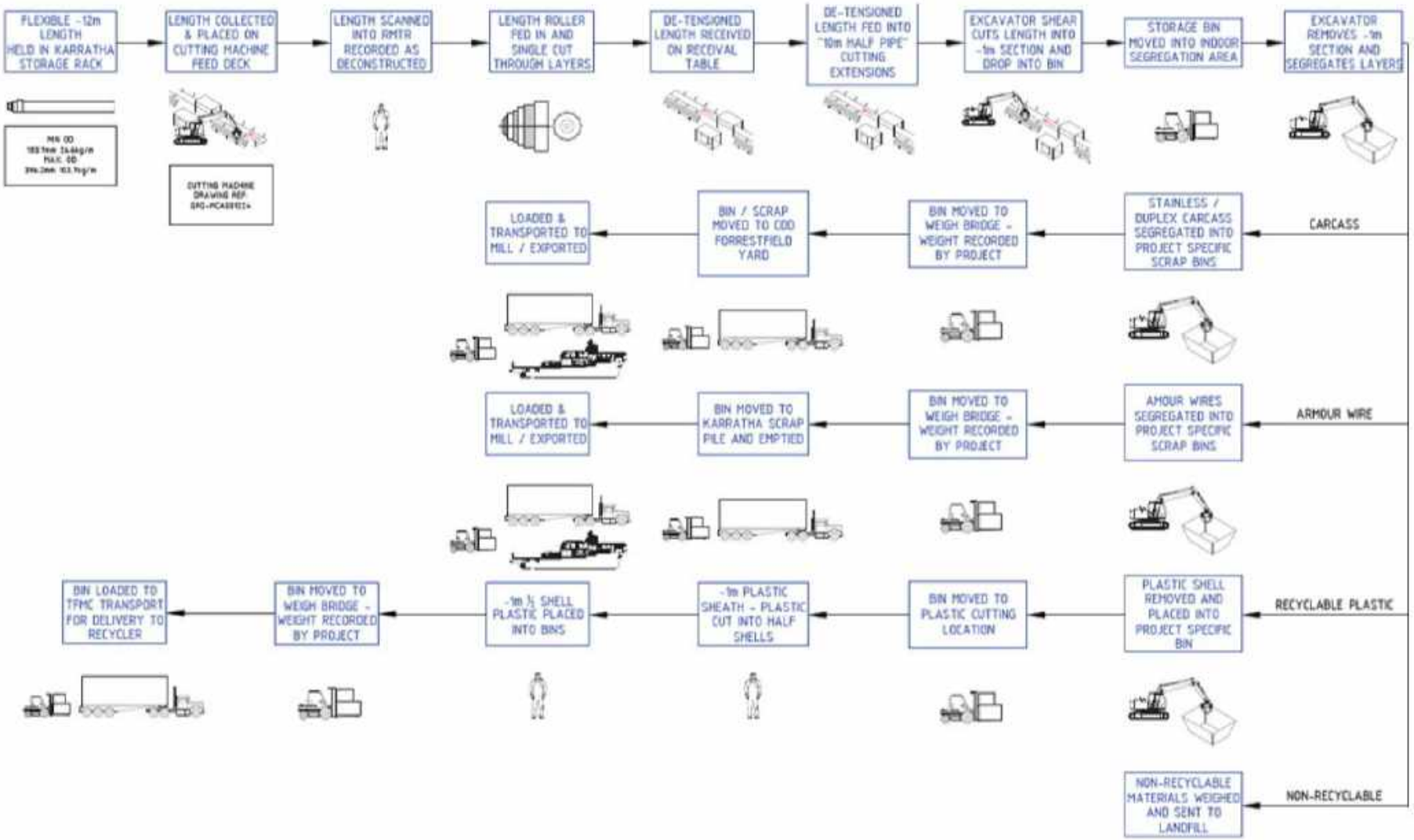


Figure 2-3: Flexible pipe deconstruction process

2.4.3 Waste Processing - Umbilical Deconstruction Process

The umbilical deconstruction process involves three stages:

1. Cut to length.
2. Material separation.
3. Plastic shredding.

The process flow diagram of the umbilical destruction process is provided in Figure 2-7 and the following sections provide a description of each stage.

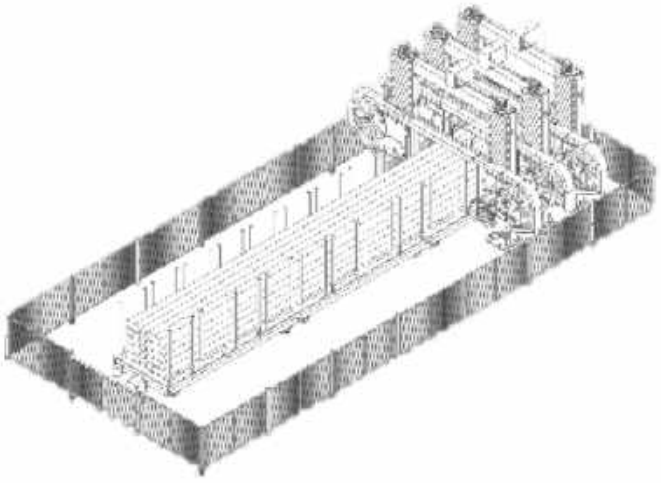
2.4.3.1 Umbilical Cutting

The flat racks of umbilical lengths are sent through an automated multi-wire saw, which cuts the lengths into 4 x 1 m lengths per cut. A schematic and photographs of the multi-wire saw are shown in Table 2-5.

Lengths of umbilical

Multi-wire saw enclosure

Multi-wire saw



Multi-wire saw schematic

Figure 2-4: Multi-wire saw

The multi-wire saw uses water to cool the cutting wires. The area has a dedicated drainage system that collects the water in a concrete drain and sump, which is pumped through a treatment system (filtration) and stored in plastic water tanks for re-use.

2.4.3.2 Material Separation

Material separation takes place in the Material Separation Shed using a dedicated processing line. The 1 m long lengths of umbilical are loaded on to the separation line and moved through the process using rollers, as follows and shown on the schematic in Figure 2-5:

- Removal of the outer sheath with a cable stripper;
- Removal of the armour wire using a cutting saw; and
- Removal of the inner sheath with a cable stripper.

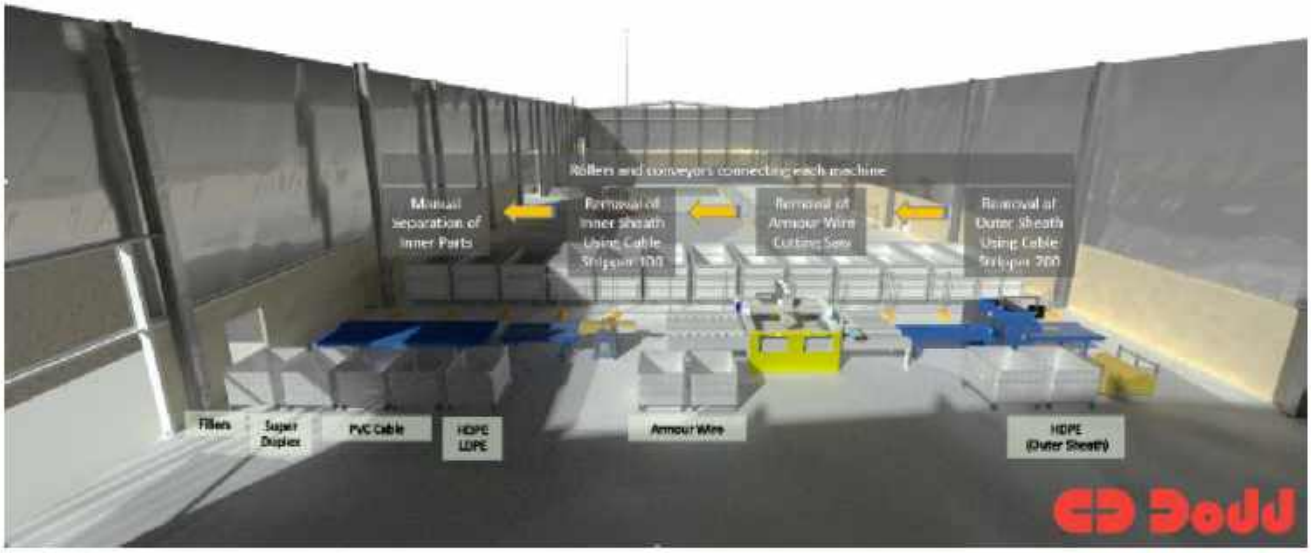


Figure 2-5: Material separation line schematic

At each stage, the separated materials are manually extracted and placed in bins, as follows:

- Fillers;
- Super Duplex (stainless steel)
- PVC cable;
- HDPE/LDPE plastic;
- Armour wire; and
- HDPE outer sheath.

The separated material is stored in the building pending removal off-site for recovery or disposal either directly or through the Scrap Yard.

Images of the material separation line are shown in Figure 2-6.

2.4.3.3 Plastic Shredding

The 1 m lengths of plastic, for example from the outer sheaths of the umbilicals, are light bulky and will be shredded to aid transportation for off-site recovery, as described in Section 2.4.2.3.

Material separation line

Removal of outer sheath

Plastic outter sheaths

Umbilical with sheath removed

Saw to cut armour wire

Umbilical with cut armour wire

Inner cabling

Separated material

Separated armour wire

Figure 2-6: Material separation line photographs

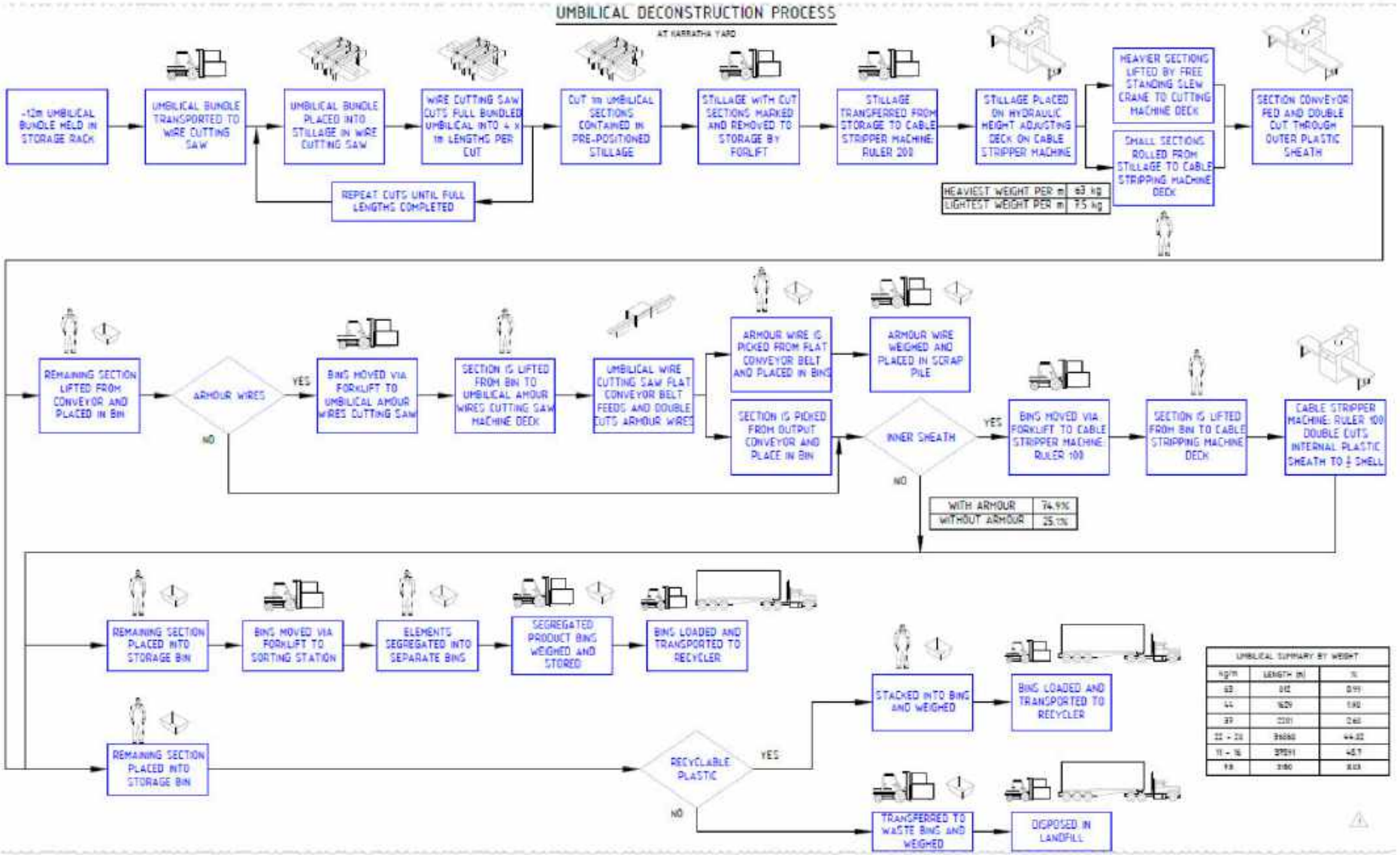


Figure 2-7: Umbilical deconstruction process

2.5 Monitoring

C.D. Dodd measures and records the weight of all inputs to the premises and all materials sent for recovery and recycling (Table 2-9).

Table 2-9: Monitoring

Waste type	Unit	Frequency
Ferrous metal	Tonnes	Each load arriving at the premises and each load leaving the premises.
Non-ferrous metal (aluminium)		
Non-ferrous (other)		
Mixed construction and demolition waste		
Lead acid batteries		
Used tyres		
Decommissioned structures (contaminated)		
Non-conforming waste types		Each load leaving or rejected from the premises.
Wastewater	m^3	

3. Emissions and Discharges

The key emissions and discharges and associated actual or likely pathways during premises operation are detailed in Table 3-1. The table also details the proposed control measures to assist in controlling these emissions, where necessary.

Table 3-1: Emissions and discharges

Source of emission and discharge	Emission or discharge type	Volume and frequency	Proposed controls	Location of premises layout plan
Scrap Metal Yard				
Operation of scrap metal recycling facility Stockpiling of scrap metal Traffic movement and deliveries	Dust	Fugitive, infrequent	• Wet down roads and unsurfaced yard as required. • Vehicle speed restricted on site. • Dust generating activities modulated according to weather conditions. • Visual inspections of work areas undertaken daily. • Dust suppressant/surface stabilisation materials used, if required.	Scrap Metal Yard
Operation of scrap metal recycling facility Traffic movement and deliveries	Noise and vibration	Fugitive, infrequent	• Mobile plant fitted with broadband reversing alarms. • Mobile plant maintained in accordance with the manufacturer's specifications. • Operated in a manner that ensures related noise emissions comply within the Environmental Protection (Noise) Regulations 1997.	Scrap Metal Yard
Storage of lead batteries and other hazardous waste	Potentially contaminated stormwater	Fugitive, infrequent	• Limits of acceptance of environmentally hazardous liquids. • Batteries stored wrapped on bunded pallets. • Stormwater contained on site, where practicable. • Liquid residue (e.g. oils and hydrocarbons) discovered in accepted scrap metal collected and stored in bunded containers. • Spill kits maintained on site. • Spill response procedure for chemical, fuel or oil spills.	Scrap Metal Yard
	Spills or leaks of environmentally hazardous liquid	Fugitive (<1,000L), infrequent		

Source of emission and discharge	Emission or discharge type	Volume and frequency	Proposed controls	Location of premises layout plan
Fumes, smoke, odour	Oxy cutting	Fugitive, regular	• Oxy cutting ceased if smoke observed crossing the premises boundary. • Where practicable, all non-metal surface coatings (including but not limited to plastic, resin, paint, rubber, concrete, synthetic coatings) are removed from the work surface of a scrap metal item, prior to cutting. • Temporary screens used where possible. • Oxy cutting not to occur within 10 m of any flammable materials. • Prior to any oxy-cutting activities, the area is wetted down to reduce the risk of ignition from sparks and/or molten metal. • Oxy-cutting area is kept free of combustible materials, including vegetation and organic litter. • Any combustible materials that cannot be removed are covered using suitable guards or material during cutting activities.	Scrap Metal Yard
Smoke, odour	Fire (tyres/ hydrocarbons)	Fugitive, emergency conditions	• On-site fire management and prevention equipment, including but not limit to fire hydrant and hose reel, mobile water trailer, fire extinguishers. • All on-site fire management and prevention equipment maintained in good working order. • Tyres stacked in skip bins or containers. • Less than 100 tyres stored on site at any one time.	Scrap Metal Yard
Firefighting water	Fire (tyres/ hydrocarbons)	Fugitive, emergency conditions	• Stormwater/firefighting water collected in low points in the yard, which are kept clear.	Scrap Metal Yard

Source of emission and discharge	Emission or discharge type	Volume and frequency	Proposed controls	Location of premises layout plan
Decontamination Yard				
Acceptance, storage and decontamination of contaminated items	Contaminated stormwater	Intermittent, fugitive	• Contaminated items stored in bunded areas. • Bunding regularly inspected to ensure integrity and capacity is maintained. • Rainwater contained in bunds discharged only when no spills or leaks have occurred within bunded area, with clean rainwater discharge to ground and contaminated water contained in IBCs for treatment on-site or removal off-site.	Bunded storage areas
Storage of environmentally hazardous materials				Waste storage areas
Decontamination of items	Radon gas	Fugitive, very low emissions expected	• NORM waste stored in lined, sealed UN-rated drums in lockable container. • Periodic external gamma surveys around storage containers. • Control limits and monitoring implemented through Radiation Licence and Radiation Safety Management Plan.	NORM waste storage area
Decontamination of items	Mercury vapour	Fugitive, very low emissions expected	• Cleaning chemicals bind the mercury to prevent release of mercury vapour. • Mercury waste stored in lined, sealed UN-rated drums in lockable container. • Periodic mercury vapour monitoring around cleaning station and racks, and waste storage area.	Chemical cleaning stations and mercury waste storage area
Decontamination of items	Filtered industrial wash water or cleaning chemicals (spills or leaks from IBCs, tanks and transfer hoses)	Intermittent, fugitive (no more than 10 m^3 stored at any one time in maximum 1,000 L IBCs)	• Wash water is filtered and reused for cleaning activities. • Excess water stored in IBCs in bunded areas. • Bunding regularly inspected to ensure integrity and capacity is maintained.	Chemical cleaning stations and wastewater storage area
Storage of environmentally hazardous materials	Contaminated waste (NORM or mercury)	Intermittent, maximum container size 205 L	• Drums stored on portable bunds in secure container with secondary bunding. • Regular inspection of drums for defects, leaks. • Personnel appropriately trained in handling drums.	Waste storage areas

Source of emission and discharge	Emission or discharge type	Volume and frequency	Proposed controls	Location of premises layout plan
Processing Yard and Material Separation Building				
Material handling (forklifts, excavator shears) and cutting			• Mobile plant fitted with broadband reversing alarms. • Mobile plant and equipment maintained in accordance with the manufacturer's specifications. • Material separation occurs inside enclosed building. • Premises operated in a manner that ensures related noise emissions comply within the Environmental Protection (Noise) Regulations 1997.	Processing Yard and Material Separation Building
Cutting saws	Contaminated stormwater		• Only cleaned, decontaminated items accepted (no liquids). • Closed loop cooling systems with filtration treatment. • Cooling water stored in plastic tanks.	Processing Yard
Material separation, including plastic shredding	Noise		• Mobile plant fitted with broadband reversing alarms. • Mobile plant and equipment maintained in accordance with the manufacturer's specifications. • Premises operated in a manner that ensures related noise emissions comply within the Environmental Protection (Noise) Regulations 1997.	Material Separation Building

4. Location and Siting

4.1 Receptors

The premises is in the Gap Ridge Industrial Estate, approximately 5 km from Karratha Airport and 9 km from Karratha city center. Surrounding land uses are comprised of:

- Industrial development land to the northeast, southeast and south;
- Commercial industrial to the north; and
- Railway reserve to the west.

Table 4-1 below provides a summary of potential human and environmental receptors that may be impacted because of activities on or emission and discharges from the premises. The premises siting and location is shown on Attachment 2C.

Table 4-1: Sensitive and environmental receptors

Sensitive Receptor	Approximate distance and direction from premises boundary	
Auctioneers and valuers (owned by the applicant)	Adjacent to the northern boundary	
Stayover Kingfisher Village	3.4 km southeast	
Roadhouse	3.8 km southeast	
Workforce accommodation	2 km northeast	
Cievo Karratha Village	2.4 km northeast	
Residential properties	2.7 km northeast	
Environmental receptor	**Description**	**Distance and direction from premises boundary**
Environmentally Sensitive Areas (ESAs)	No nearby ESAs	The closest ESA is the Dampier Archipelago, approximately 8 km northeast.
Conservation Significant Ecological Communities	Threatened ecological communities	Roebourne Plains Gilgai Grasslands mapped within the area.
Cultural heritage	Aboriginal and other heritage sites	No registered or lodged sites within the premises boundary. The closest site (ref: 26452) is approximately 220 m to the southeast.
Rivers, lakes, oceans, and other bodies of surface water, etc.	Proclaimed areas under the *Rights in Water and Irrigation Act 1914*	Within Pilbara Surface Water Area
Groundwater	Proclaimed areas under the *Rights in Water and Irrigation Act 1914*	Within Pilbara Groundwater Area
	Groundwater aquifer	Groundwater typically 6-10m below existing ground level.[4] Hyper-saline brackish groundwater.

[4] Table 6 of DWER decision report for Works Approval W6929/2024/1 (link)

4.2 Climate

The Karratha region is semi-arid, with high temperatures in the summer months and variable rainfall patterns interspersed with long dry periods. The area is subject to several cyclones annually. The closest weather station which records both temperature and rainfall data is Karratha Aero (No. 4083), approximately 5.8 km northeast of the premises.

Summary climate data (2023) for Karratha Aero[5] is shown in Figure 4-1 below. The mean temperatures range from 13.9°C in July to 36.2°C in March, whilst the mean monthly rainfall is 0.4 mm in October up to 76.4 mm in March.

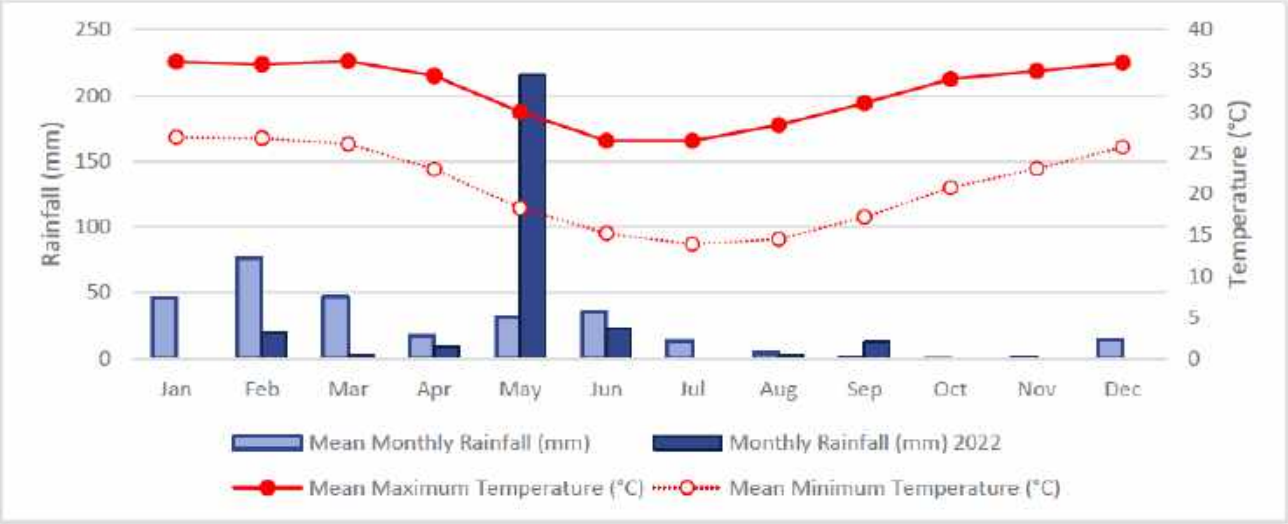


Figure 4-1: Climate data

Wind frequency data collected at the Karratha Aero station from May 1993 to August 2010, shows the prevailing wind direction is west to east in the morning and north-easterly to westerly in the afternoon (Figure 5.2).

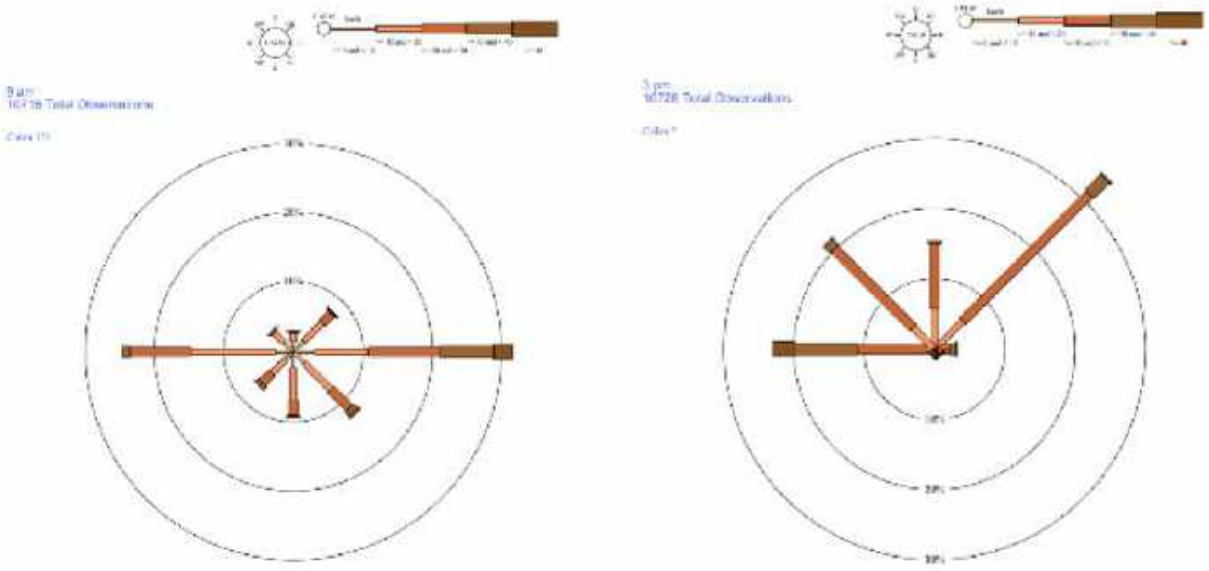


Figure 4.2 Mean annual wind speeds and direction at 9am (left) and 3pm (right) (BoM, 2023)

[5] Climate Data Online

5. Limitations

Scope of services

This report ("the report") has been prepared by JBS&G in accordance with the scope of services set out in the contract, or as otherwise agreed, between the Client and JBS&G. In some circumstances, a range of factors such as time, budget, access and/or site disturbance constraints may have limited the scope of services. This report is strictly limited to the matters stated in it and is not to be read as extending, by implication, to any other matter in connection with the matters addressed in it.

Reliance on data

In preparing the report, JBS&G has relied upon data and other information provided by the Client and other individuals and organisations, most of which are referred to in the report ("the data"). Except as otherwise expressly stated in the report, JBS&G has not verified the accuracy or completeness of the data. To the extent that the statements, opinions, facts, information, conclusions and/or recommendations in the report ("conclusions") are based in whole or part on the data, those conclusions are contingent upon the accuracy and completeness of the data. JBS&G has also not attempted to determine whether any material matter has been omitted from the data. JBS&G will not be liable in relation to incorrect conclusions should any data, information or condition be incorrect or have been concealed, withheld, misrepresented or otherwise not fully disclosed to JBS&G. The making of any assumption does not imply that JBS&G has made any enquiry to verify the correctness of that assumption.

The report is based on conditions encountered and information received at the time of preparation of this report or the time that site investigations were carried out. JBS&G disclaims responsibility for any changes that may have occurred after this time. This report and any legal issues arising from it are governed by and construed in accordance with the law as at the date of this report.

Environmental conclusions

Within the limitations imposed by the scope of services, the preparation of this report has been undertaken and performed in a professional manner, in accordance with generally accepted environmental consulting practices. No other warranty, whether express or implied, is made, including to any third parties, and no liability will be accepted for use or interpretation of this report by any third party.

The advice herein relates only to this project and all results conclusions and recommendations made should be reviewed by a competent person with experience in environmental investigations, before being used for any other purpose.

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Attachment 1A: Occupier Status

ASIC
Australian Securities & Investments Commission

Current Company Extract

Name: BEDROCK PROPERTY GROUP PTY LTD
ACN: 603 348 554

Date/Time: 01 September 2025 AEST 03:50:17 PM

This extract contains information derived from the Australian Securities and Investments Commission's (ASIC) database under section 1274A of the Corporations Act 2001.

Please advise ASIC of any error or omission which you may identify.

EXTRACT

Organisation Details		Document Number
Current Organisation Details		
Name:	BEDROCK PROPERTY GROUP PTY LTD	2E1310591
ACN:	603 348 554	
Registered in:	Western Australia	
Registration date:	12/12/2014	
Next review date:	12/12/2025	
Name start date:	12/12/2014	
Status:	Registered	
Company type:	Australian Proprietary Company	
Class:	Limited By Shares	
Subclass:	Proprietary Company	

Address Details	Document Number
Current	

[redacted]

[redacted]

[redacted]

Share Information
Share Structure

Class	Description	Number issued	Total amount paid	Total amount unpaid	Document number
ORD	ORDINARY	2	2.00	0.00	2E1310591

Members

[redacted]

End of Extract of 2 Pages

Attachment 1B: ASIC Company Extract

ASIC
Australian Securities & Investments Commission

Current Company Extract

Name: DODD & DODD GROUP PTY LTD
ACN: 009 238 671

Date/Time: 24 September 2024 AEST 03:43:48 PM

This extract contains information derived from the Australian Securities and Investments Commission's (ASIC) database under section 1274A of the Corporations Act 2001.

Please advise ASIC of any error or omission which you may identify.

EXTRACT

Organisation Details		Document Number
Current Organisation Details		
Name:	DODD & DODD GROUP PTY LTD	022371291
ACN:	009 238 671	
ABN:	98009238671	
Registered in:	Western Australia	
Registration date:	25/05/1987	
Next review date:	25/05/2025	
Name start date:	30/09/2005	
Previous state number:	C0822594E	
Status:	Registered	
Company type:	Australian Proprietary Company	
Class:	Limited By Shares	
Subclass:	Proprietary Company	

Address Details	Document Number
Current	

[redacted]

Contact Address

[redacted]

Share Information

Share Structure

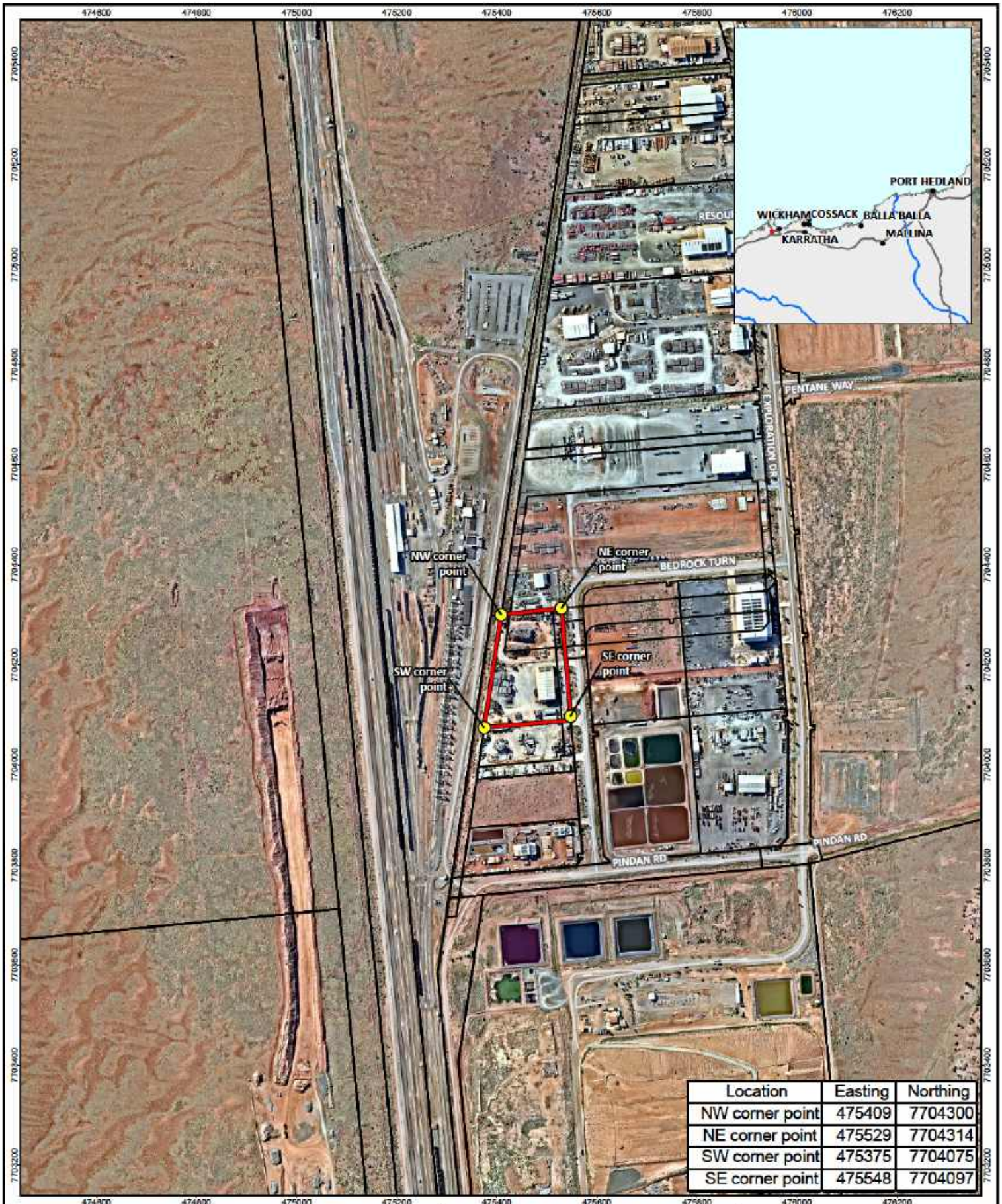
Class	Description	Number issued	Total amount paid	Total amount unpaid	Document number
ORD	ORDINARY SHARES	2	2.00	0.00	0EOH69794

Members

Note: For each class of shares issued by a proprietary company, ASIC records the details of the top twenty members of the class (based on shareholdings). The details of any other members holding the same number of shares as the twentieth ranked member will also be recorded by ASIC on the database. Where available, historical records show that a member has ceased to be ranked amongst the top twenty members. This may, but does not necessarily mean, that they have ceased to be a member of the company.

End of Extract of 2 Pages

Attachment 2: Premises Maps



Location	Easting	Northing
NW corner point	475409	7704300
NE corner point	475529	7704314
SW corner point	475375	7704075
SE corner point	475548	7704097

Legend

- Premises Boundary (Part of Lot 109 P0705061
- Cadastral boundary (LGATE-002)
- Roads (LGATE-195)
  - Minor road
- Corner points coordinates

Scale: 1:10,000 at A4

0 100 200 metres

Coord. Sys. GDA2020 MGA Zone 50

[redacted]

[redacted]

[redacted] [redacted]

Drawn By: droberts

[redacted]

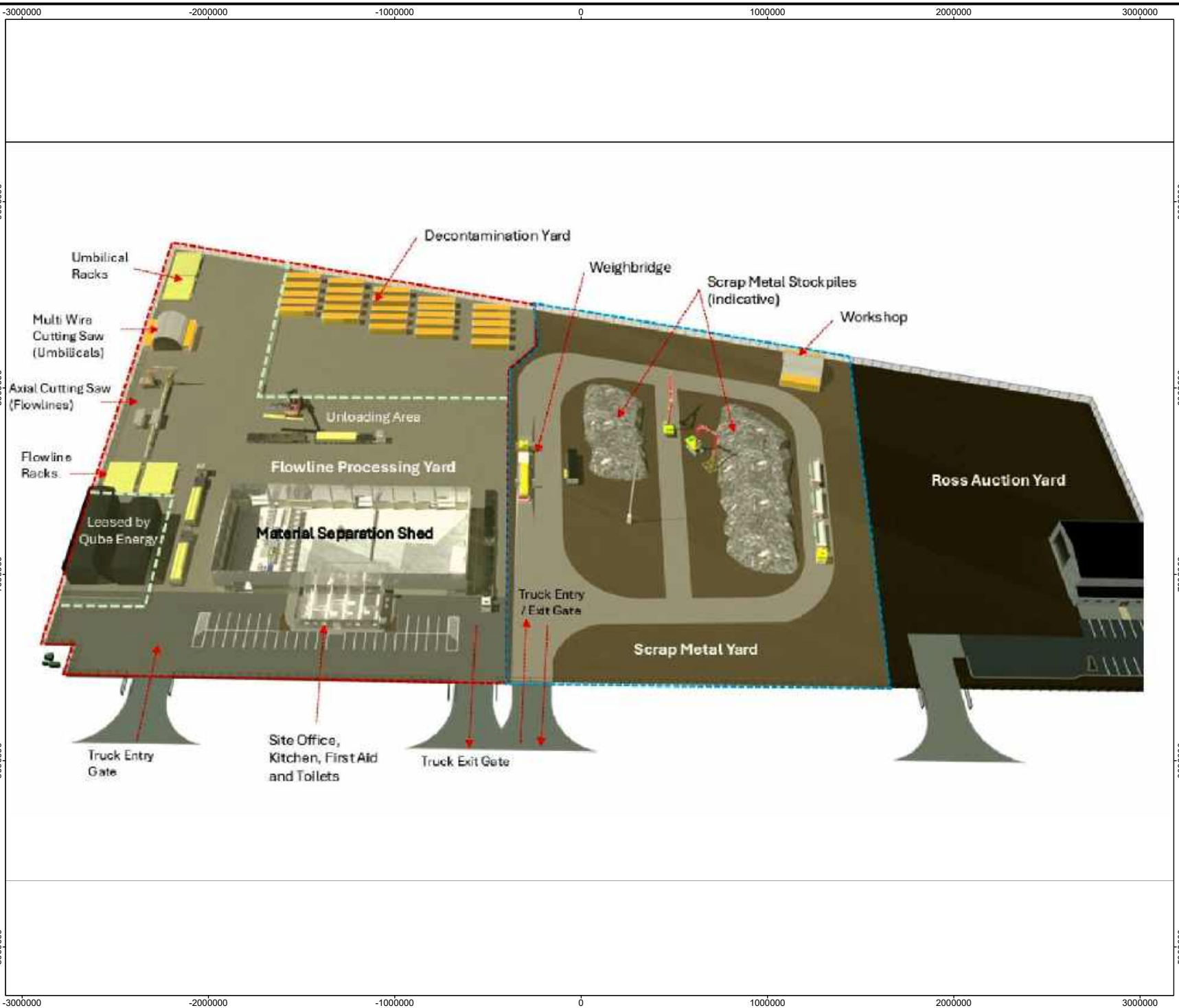
Lot 109 Bedrock Turn, Gap Ridge 6714, WA

PREMISES BOUNDARY

ATTACHMENT 2A

JBS&G

File Name: C:\Users\droberts\JBS&G Australia\JBS&G - DCS - Internal - Documents\Projects\Dodd & Dodd Group Pty Ltd\65842 Lot 109 Bedrock Turn Gap Ridge\GIS\02_MapProjects\65842 Lot 109 Bedrock Turn Gap Ridge R01.aprx
Image Reference: www.nearmap.com© - Imagery Date: 14 May 2025
Layout: 65842_A4P_2A_Premises Boundary



Legend

- Decontamination Yard
- Processing Yard and Material Separation Shed
- Scrap Metal Yard

JBS&G

[redacted]

Not to scale

Coord. Sys. GDA2020 MGA Zone 50

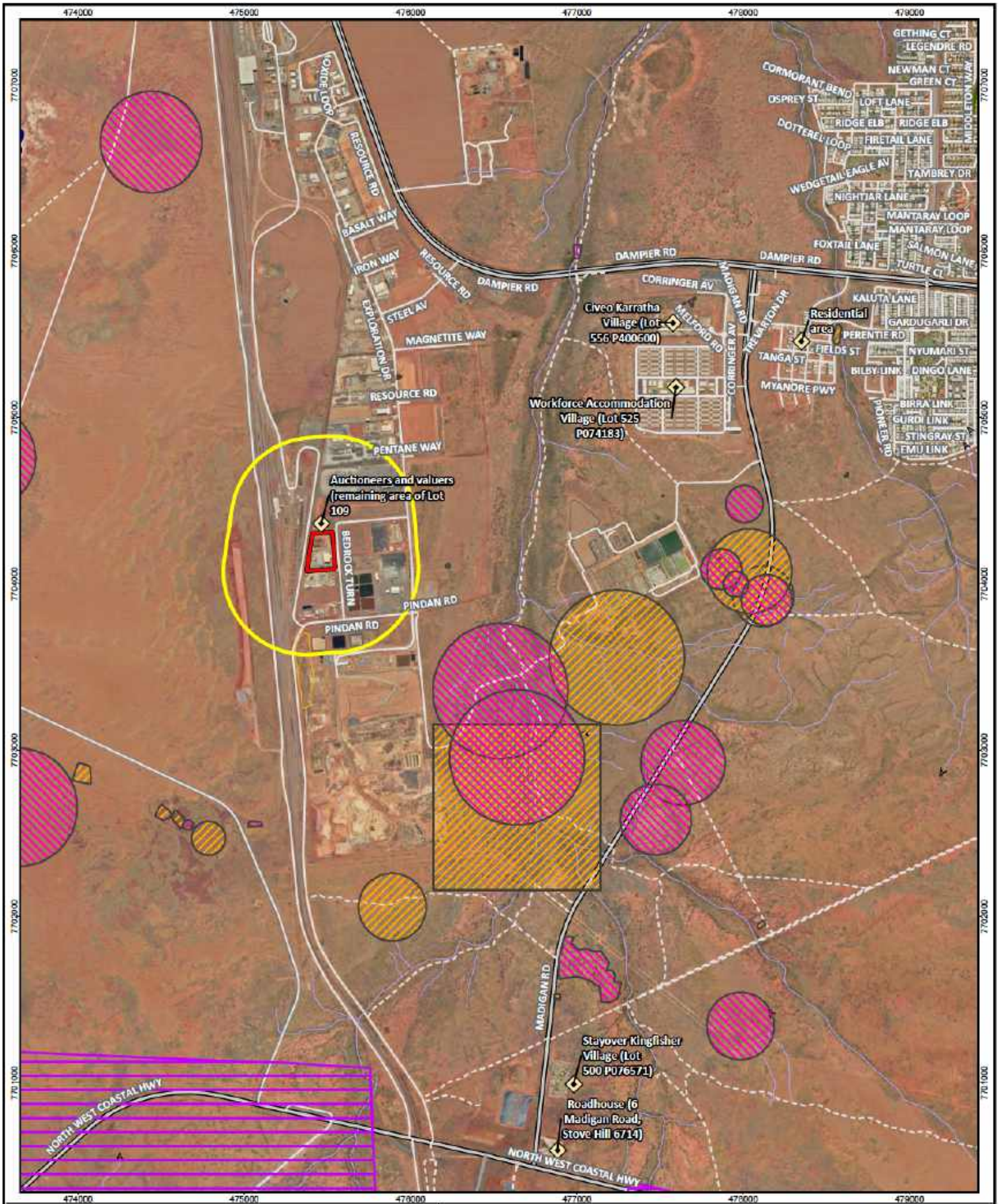
Lot 109 Bedrock Turn, Gap Ridge 6714, WA

PREMISES LAYOUT PLAN

ATTACHMENT 2B

File Name: C:\Users\droberts\JBS&G Australia\JBS&G - DCS - Internal - Documents\Projects\Dodd & Dodd Group Pty Ltd\65842 Lot 109 Bedrock Turn Gap Ridge\GIS\02_MapProjects\65842 Lot 109 Bedrock Turn Gap Ridge R01.aprx

Layout: 65842_A4L_2B_Premises Layout



Legend

- Premises Boundary (Part of Lot 109 P0705061)
- Premises Boundary 500m buffer
- Aboriginal Cultural Heritage - Register (DPLH-099)
- Heritage List
- Aboriginal Cultural Heritage - Lodged (DPLH-100)

Hydrography (DWER - 031)

- Watercourse - minor, non-perennial
- Drain - major
- Lake - perennial
- Earth Dam
- Flow Direction Arrow

Roads (LGATE-195)

- Highway
- Major road
- Minor road

Scale: 1:30,000 at A4	0 250 500 Meters
Coord. Sys. GDA2020 MGA Zone 50	
Job Number: 65842	
Client: Dodd & Dodd Group Pty Ltd	
Version: A	Date: 06-Jun-2025
Drawn By: [redacted]	
Checked E[redacted]	

Lot 109 Bedrock Turn, Gap Ridge 6714, WA

PREMISES SITING AND LOCATION

ATTACHMENT 2C

JBS&G

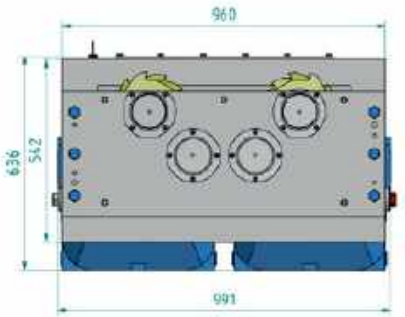
File Name: C:\Users\droberts\JBS&G Australia\JBS&G - DCS - Internal - Documents\Projects\Dodd & Dodd Group Pty Ltd\65842 Lot 109 Bedrock Turn Gap Ridge\GIS\02_MapProjects\65842 Lot 109 Bedrock Turn Gap Ridge R01.aprx
Image Reference: Aboriginal Cultural Heritage - Lodged (DPLH-100)
Heritage\65842_R01M-060 Premises Siting and Location
Aboriginal Cultural Heritage - Register (DPLH-099)

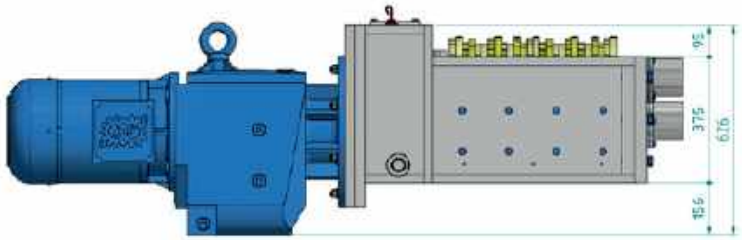
Attachment 8A: Plastic Shredders Specification Sheets

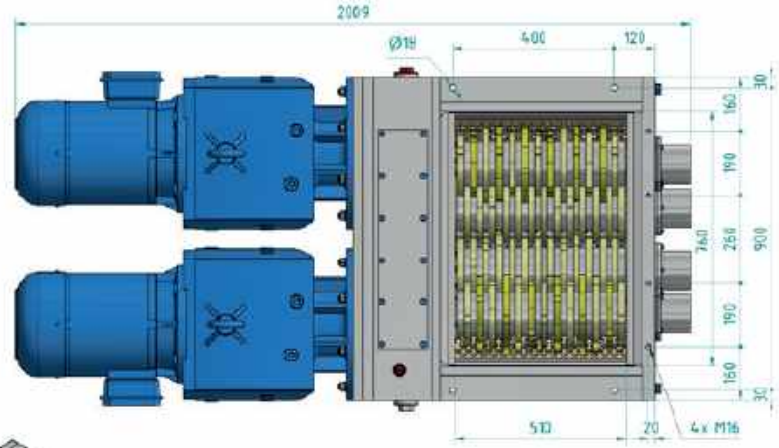
MOCO SHREDDER

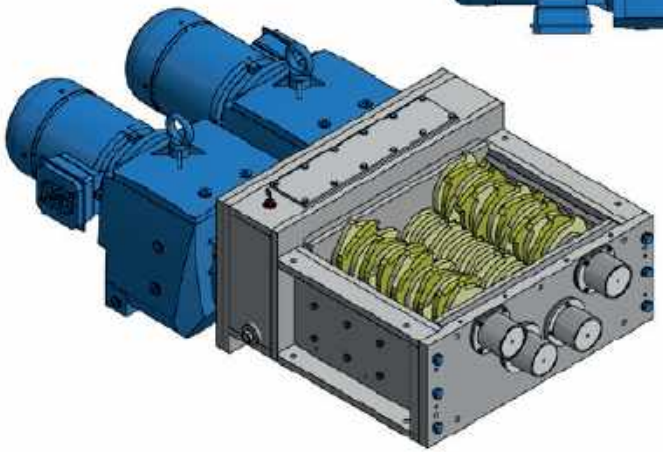
MOCO AZ 13

TECHNICAL DATA









MOCO Maschinen- und Apparatebau GmbH & Co. KG
P +49 6204 9685-0 | www.moco-shredder.de

THE SYSTEM

MOCO AZ 13, shredder with four slow and low noise running hexagonal working shafts. Low vibration and minimal maintenance, compact design, robust welded construction, low power consumption, individually replaceable cutting discs. Very good intake behavior, even of bulky bodies. High comminuting degree. The material is retained by an optional sieve inside the cutting chamber for a multiple shredding, until its dimension is smaller than the sieve holes.

THE ELECTRIC

The control of the AC geared motors is equipped with an automatic overload-dependent reverse control.

THE THROUGHPUT EXAMPLE

3 to 6 cubic meters of loose mixed waste per hour.

THE DIMENSIONS

- Cutting section 600 x 760 mm
- Exterior dimensions 2,010 x 960 x 630 mm
- Weight approx 2,200 kg
- Drive power 2 x 7.5 kW to 2 x 18.5 kW
- Voltage 400 V / 50 Hz
- Further cutting unit dimensions available

THE OPTIONS

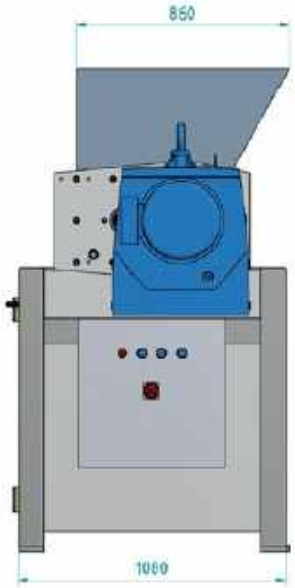
- Customized hopper and frame
- Cutting thicknesses of 12, 15 and 19 mm, respectively upon request
- Feeding devices (MOCO ZB 01)
- Connecting funnel for extraction units

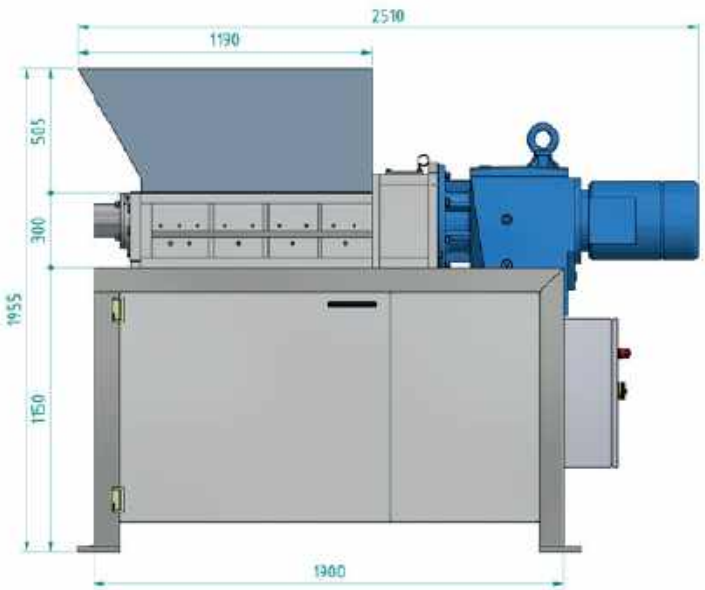
SHREDDING TECHNOLOGY FROM MOCO – PERFECTLY TAILORED TO MEET YOUR REQUIREMENTS.

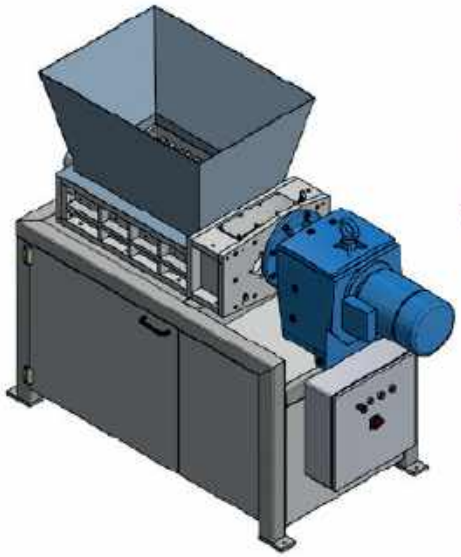
MOCO SHREDDER

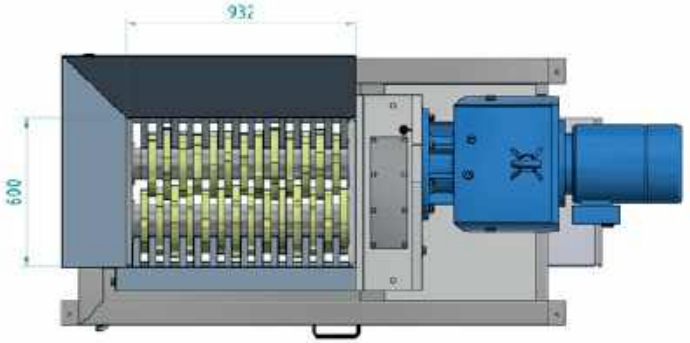
MOCO AZ 15E

TECHNICAL DATA









THE SYSTEM

MOCO AZ 15E, shredder with slow and low noise running toothed working shafts. Low vibration and minimal maintenance, compact design, robust welded construction, low power consumption, individually replaceable cutting discs.

THE ELECTRIC

The control of the AC geared motor is equipped with an automatic overload-dependent reverse control.

THE THROUGHPUT EXAMPLE

10 to 15 cubic meters of loose mixed waste per hour.

THE DIMENSIONS

- Cutting section 932 x 600 mm
- Exterior dimensions 2,486 x 790 x 650 mm
- Weight approx 2,320 kg
- Drive power 15 to 37 kW
- Voltage 400 V / 50 Hz
- Further cutting unit dimensions available

THE OPTIONS

- Customized hopper and frame
- Cutting thicknesses of 19, 25 and 31 mm, respectively upon request
- Feeding devices (MOCO ZB 01)
- Sieves to obtain a specific final particle size
- Connecting funnel for extraction units

SHREDDING TECHNOLOGY FROM MOCO – PERFECTLY TAILORED TO MEET YOUR REQUIREMENTS.

MOCO Maschinen- und Apparatebau GmbH & Co. KG
P +49 6204 9685-0 | www.moco-shredder.de

Attachment 10: Licence application fee

Licence application fee components

Part 1: Premises component

Category	Description	Capacity	Capacity Range	Units
47	Scrap Metal Recovery	40,000 tonnes per year	More than 10,000 tonnes per year	100
61A	Solid waste facility	20,000 tonnes per year	More than 10,000 but no more than 100,000 tonnes per year	45

Part 2: Waste component

No Part 2 waste discharge.

Part 3: Discharge component

No discharges of pollutants into air, onto land or into waters.

Total application fee

Component	Units	Unit fee	Fee
Part 1: Premises	100	[redacted]	[redacted]
Part 2: Waste	0		
Part 3: Discharges	0		
Total			

Document Distribution

Rev No.	Copies	Recipient	Date
0	1: Electronic (final)	C.D. Dodd; DWER	29/08/2025

Document Status

Rev No.	Author	Reviewer	Approved for Issue		
		Name	Name	Signature	Date
0	JBS&G	JB/AW	JB	On file	29/08/2025

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Turrbal/Yuggera Country | Level 37, 123
Eagle Street, Brisbane, QLD 4000
T: 07 3211 5350

Bunbury

Wardandi Noongar Country | 177
Spencer Street Bunbury, WA 6230
T: 08 9792 4797

Canberra

Ngunnawal Country | Level 1, The Realm
18 National Circuit Barton, ACT 2600
T: 02 6198 3278

Darwin

Larrakia Country | Suite G1, Level 1
48-50 Smith Street, Darwin NT 0800
T: 08 8943 0600

Hobart

Muwununa/Nuenon Country | Level 6,
111 Macquarie Street Hobart, TAS 7000
T: 03 6108 9054

Melbourne

Kulin Country | Level 5, 10 Queen
Street, Melbourne, VIC 3000
T: 03 9642 0599

Newcastle

Awabakal/Worimi Country | 61 / 63
Parry Street Newcastle West, NSW 2302
T: 02 8245 0300

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