



Works Approval Application- Schutz Australia

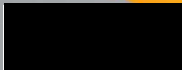
Attachment 8- Supporting Documentation

SCHÜTZ

Prepared for Schutz Australia Pty Ltd

4 November 2025

Project Number: TE24133



DOCUMENT CONTROL					
Version	Description	Date	Author	Reviewer	Approver
1.0	First Draft Release	28/03/2025			
2.0	Second Draft Release	08/04/2025			
3.0	Third Draft Release	29/10/2025			
4.0	Final Release to Client	04/11/2025			

Approval for Release

Name	Position	File Reference
	M&I team lead Principal Environmental Consultant	TE24133_Schutz Works Approval Supporting document_4.0
Signature		

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APPENDIX A Business Case for relocation of North Coogee Plant

APPENDIX B Environmental Policy

1 Introduction

1.1 Project Overview

Schutz Australia Pty Ltd (Schutz) operates a drum and container recycling business in North Coogee, Western Australia. Schutz intends to relocate their business to 120 Artemis Loop, Wattleup (the site), located within the Orion Industrial Park zone, under the Latitude 32 Industry Zone structure plan. The site is located approximately 25 km south-west of Perth Central business District (CBD), within the City of Cockburn Figure 1-1. The site is approximately 5.599 hectares (Ha) and bordered by a primary regional road Rockingham Road (allocated to be the Fremantle-Rockingham Controlled Access Highway (FRCAH)) to the west, the Midland to Fremantle railway line to the east, a district distributor road Russell Road to the North and residential property and the Henderson Waste Recovery Park on the southern boundary.

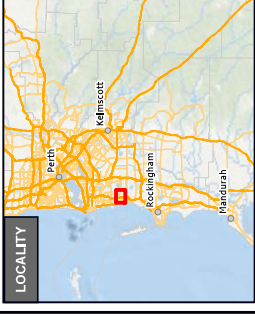
Talis Consultants Pty Ltd has been commissioned to facilitate the Works Approval Application for the relocation of the operations from the North Coogee Premises to the site. The North Coogee Premises is currently operating under Licence L5154/1989/10 for Category 62 Solid waste depot, which will be surrendered to the Department of Water and Environmental Regulation (DWER) upon settling at the new site.



LEGEND

- Premises Boundary
- Lakes
- Conservation Park
- Nature Reserve
- Mine Sites (Minedex)**
- Operating
- Proposed
- Rail Network**
- Railway Stations
- Railway Lines
- Western Australian Roads**
- Freeway / Highway
- Main Road
- Minor Road

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SITE LOCALITY
 Lot 517 on DP 425807
 Works Approval
 Schuitz Australia Pty Ltd

Prepared:	Date:	17/03/2025
Reviewed:	Revision:	A
Project:	TE24133	

Figure 1-1

1.2 Site Overview

The site is on Lot 517, Plan 425807 and located within the Orion Industrial Park Development Area 6A and covering approximately 5.599 ha of the industrial park. The Orion Industrial Park is mapped within the Latitude 32 structure plan which incorporates approximately 1,400 ha of land and is strategically located within the Western Trade Coast, planned to complement the other industrial estates, including Australian Marine Complex Henderson, Kwinana Industrial Area and Rockingham Industry Zone by supplying general and transport industrial land to support the strategic heavy and special industrial sites (Landcorp 2020).

The Orion Industrial Park is near the coastal industrial development that includes the Kwinana Industrial Area. Current land uses are mixed, including two townsites, extractive industries, other industry, waste disposal, market gardens, turf farms, nurseries and other rural uses, rural residential, cleared land and bushland. The Orion Park development area is a former limestone quarry, and the proposed development is expected to house around 100 general industrial businesses (Landcorp 2020).

Cockburn Cement Limited (CCL) is the closest industrial premise to the site, located on Russell Road and 152 m from the northern boundary of Development Area 6A. The Cockburn Resource Recovery site (Henderson Waste Recovery Park) is located on the adjacent southern boundary of the site with Brajkovich Landfill and Recycling located further south.

1.3 Purpose of Works Approval

To facilitate the relocation of operations at North Coogee facility to 120 Artemis Loop a Works Approval is required to support the establishment of infrastructure on site. The Proponent wants to establish the same operations that are currently licenced at the North Coogee premises which include:

- Used 110 litre agricultural/ industrial chemical drum storage
- External and internal washing/rinsing (where required) and repackaging of drums for reuse;
- Shredding/removal of damaged drums;
- Storage of reconditioned drums prior to return to chemical manufacturers
- Used intermediate bulk container (IBC) storage, reconditioning and recycling
- A vacuum distillation wastewater treatment system; and
- Licensed discharge of treated wash-water to the Water Corporation sewer

The waste produced from hydrocarbons and chemical residues from incoming drums is consolidated into IBCs and sent offsite for destruction. The Proponent also requires state of the art production facilities to produce new and reconditioned Intermediate Bulk Containers (IBC's).

1.3.1 Prescribed Premises Activities

The applicant currently holds a Prescribed Premises Licence (L5154/1989/10) which authorises prescribed activities outlined in Table 1-1. The waste received and removed on the premises is specifically limited to industrial grease bins, IBCs and 110L plastic drums containing hydrocarbon residues or agricultural pesticide/herbicides residues.

Table 1-1: Current approved licence category and throughput

Category	Description	Throughput
62	Hazardous waste, inert waste type 2	4,000 tonnes per annual period

The proposed works application will not change the prescribed premise activities of the existing licence. The applicant will continue to operate under Category 62 activities, which allows waste to be stored or sorted, pending final disposal re-use, other than in the course of operating. The throughput will remain 4,000 tonnes per annual as shown in Table 1-1.

1.4 Current Operation Process

Operations at the current facility includes receiving used 110 litre drums and containers from agriculture and industrial facilities. The drums and containers are transported to the premises by heavy haulage trucks and upon receipt the drums are sorted into chemical groups and stored in a bunded or built in storage waiting to be recycled.

External and internal washing/rinsing is carried out using water sources from an onsite bore. Wastewater is processed through an onsite water treatment plant before being discharged to the Water Corporation Sewer. The wastewater treatment process allows water to go through a primary treatment and secondary wastewater treatment through a Hydroxon Plant on site.

Hydrocarbons and other chemical residues collected from the incoming drums and wastewater treatment are consolidated into IBCs and when sufficient IBCs are collected, they are sent offsite for disposal. Drum washing and IBC processing is carried out in enclosed bunded areas on site. Any potential contaminated runoff is directed into the Water corporation system. Figure 1-3 is a representation of the process flow at the current premises, the same flow process will be implemented at the new premises.

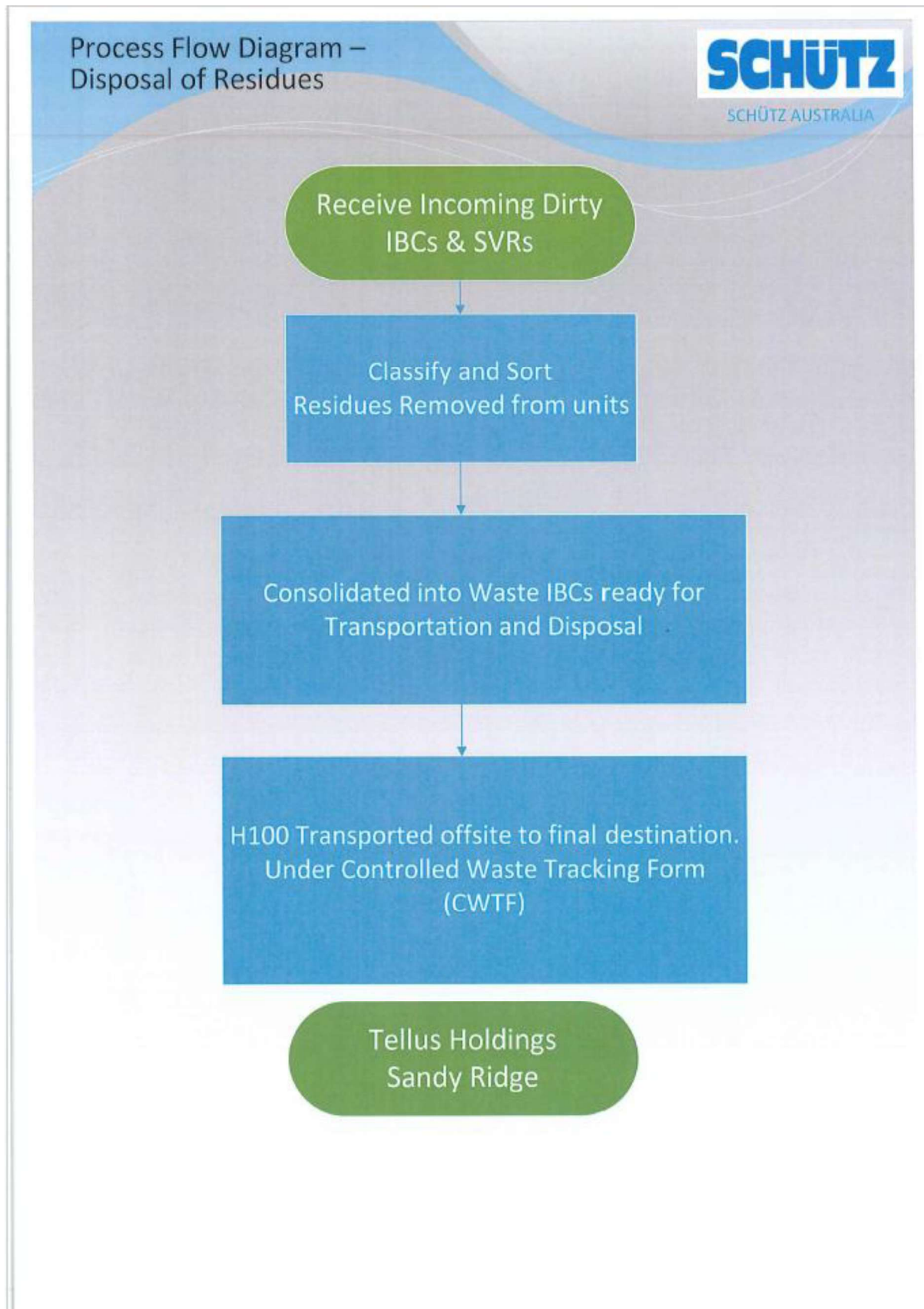


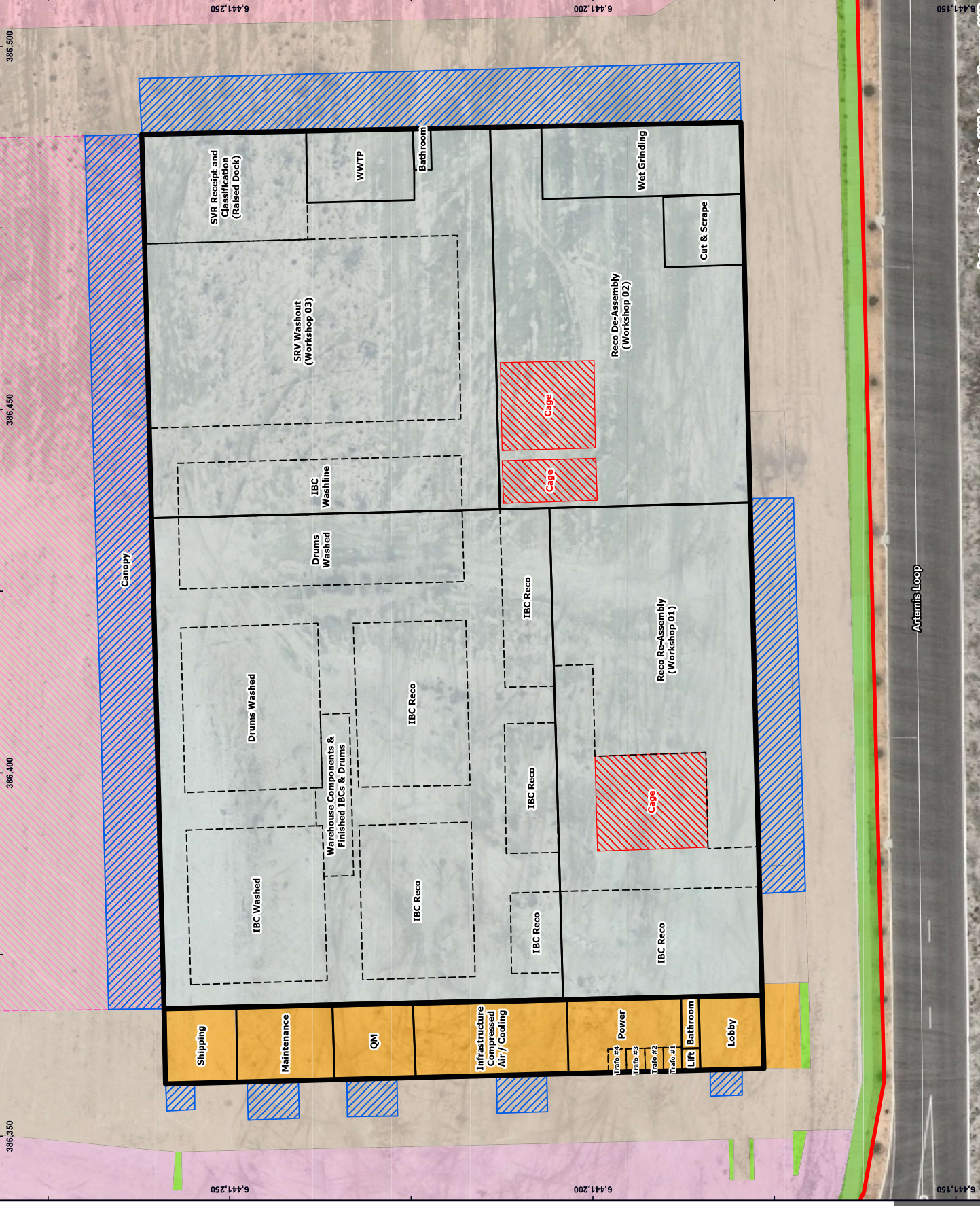
Figure 1-3:Current operations flow diagram

1.5 Proposed work features

The prescribed premises plan, shown in Figure 1-2, outlines the overall site layout and functional areas that make up the total site area of 55,991 m². The plan reflects the distribution of key operational zones, including hardstand surface warehouse and office facilities, drainage features, and laydown areas, as summarised in Table 1-2.

Table 1-2: Site Activity Disturbance Area

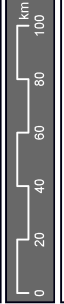
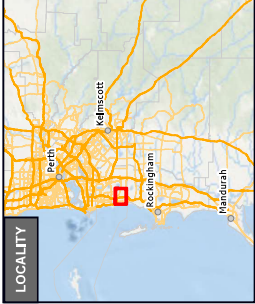
Site Activity	Total Area (m ²)	Percentage of total disturbance
Landscaping Area	1,232 m ²	2.2%
Landscape Drainage Swale Area	6,120 m ²	10.9%
Drainage Area	698 m ²	1.2%
Concrete Hardstand Area	14,794 m ²	26.4%
Bitumen Sealed Area	1,864 m ²	3.3%
Warehouse Area	10,442 m ²	18.6%
Office Area	842 m ²	1.5%
Receivals Area	7,006 m ²	12.5%
Laydown Area	13,520 m ²	24.1%
Total Site Area	55,991 m²	100%



LEGEND

- Premises Boundary**
- Indicative Premises Features**
 - Building Walls
 - Internal Walls
 - Room Divisions
 - Cages
 - Canopy
- Indicative Proposed Premises Plan**
 - Hardstand
 - Offices/Services
 - Receivals/SVR Drums
 - Landscaping
 - Swale
 - Workshop/Warehouse
 - Car Parking
 - Future Expansion
 - Western Australian Roads
 - Minor Road

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PROPOSED SITE FEATURES

Lot 517 on DP 425807
Works Approval
Schuitz Australia Pty Ltd

Prepared:	Date:	11/03/2025
Reviewed:	Revision:	A
Project:	TE24133	



Figure 1-4

Artemis Loop

1.5.1 Storage Area

The IBC ticket collection and the IBC storage area will be in the first flush area (Figure 1-2). This is where trucks offload the returned IBCs, and they get screened before they get stored on site. Returned IBCs will get sorted into chemical groups and get scheduled for draining. SVR will be offloaded from trucks on the loading dock and are stored in the first flush area.

1.5.1.1 Flush Area Holding Tanks

The first flush area includes 3 x 50,000 L holding tanks, designed to store approximately 26,000 L per tank. The holding tanks in the flush area have been specifically designed to enable gravity feed over the required distance, allowing for effective flow control via tank-mounted flow metres. This design is intended to eliminate the risk of spills to ground. The current design and Development Application (DA) have been submitted based on capturing 5mm of rainfall, and the tanks will provide additional capacity if required. This design ensures operational flexibility and compliance with the DA requirement.

1.5.2 Wet granulator System

A shredder and wet granulator loop system will be installed to facilitate the proposed IBC and SVR reconditioning operations on site. The IBCs from the cut down process will be shredded in the shredder and then enter the wet granulator and be granulated into small sizes (8-10 mm). The plastic pieces are washed during grinding in the wet granulator and further washed in the friction washer. After washing the plastic granules are dried in the friction drier and then the granules will be transferred off-site for recycling into new Schütz products.

The wet granulator and friction washer will use recycled water from its own wastewater treatment system as wash water. The water removed from the friction washer and friction drier will be directed to the wastewater water treatment system.

1.5.3 Waste Water Treatment System

The wastewater treatment system is a part of the closed loop wet granulator system, and is comprised of the following key equipment:

- Buffer tank
- Clear water tank
- Treatment tank
- Sludge holding tank
- Emergency tank
- Vibration filter; and
- Filter press

The system will be located adjacent to the granulator unit and will be treating water from the wet granulator unit, friction drier so it can be reused in these processes units. Water treatment in the system will involve filtering out particles from water in a vibration filter and removing fine particles by flocculation. Water in the sludge generated from the filtration and flocculation processes will be removed in the filter press and the sludge will be sent off to Tellus Holdings for disposal. Additional

water will be added the clear water tank to replace water lost during the treatment process. Samples will be collected from the treatment tank to determine the appropriate dosing agent and concentration required in the tank. Water in the wastewater treatment system will be recycled as a batch process. After a period of time this water will be discharged as wastewater and disposed to the sewer under a Trade Waste Agreement.

A vacuum distillation unit will be used as part of the wastewater treatment system (Figure 1-5), this allows contaminated water to be evaporated under the vacuum. The calorific energy of the emerging steam is used to heat up and evaporate the feed water, thus the systems are very energy efficient. The distillate can be recycled back into the process, creating a zero liquid discharge production. The evaporated water is collected as distillate and the residue is collected for disposal. Figure 1-5 is showing the water treatment process through the vacuum distiller.

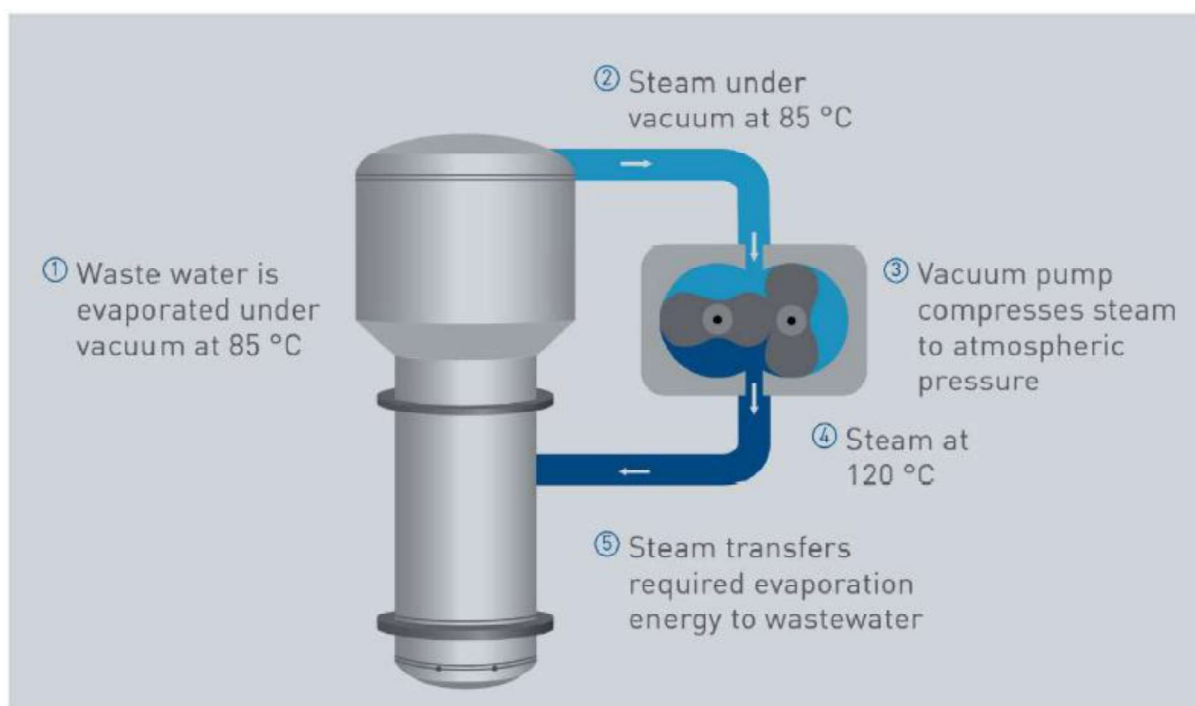


Figure 1-5: Vacuum Distillation Plant

1.5.4 IBC Cutting and Scrapping Area

After drainage and disassembling, the plastic inner of the IBC will be placed onto a conveyor belt line that will take it to the band saw. The band saw will cut the IBC approximately 20 cm from the base into two parts: top and bottom. Any liquid residue on the IBC bottoms will be manually scraped off into a waste container. The scraped IBC bottom will be placed on the conveyor belt near the entry of the shredder. The IBC top will also feed into the shredder on the conveyor belt.

The operation process produces liquid waste, which is mainly slurry from the wastewater treatment plant and herbicides residues collected from IBC and SRV drums before the recycling process. Water from drum washing is also considered waste as it contains herbicides and solvent residues. The herbicides are removed from wastewater before it is discharged into the sewer to meet the regulated permit levels (Trade waste permit) in the water treatment plant. The remaining residue after wastewater is treated and that collected from drums is sent offsite to Tellus Holding for disposal as Prescribed Industrial Waste. No untreated water will be released into to sewer at any given time.

1.6 Works Approval Application Fees

The estimated cost of the proposed works approval is **\$1,700.00**. The works approval fee calculator provided by DWER has been used to calculate this fee (DWER 2022). Figure 1-6 shows the estimated works approval cost from works approval calculator.

A	B	C
Amendment application fee calculator (effective as of 1 July 2022)	Instrument No.	
	Unit value (\$)	
Categories	Units	Fee
62 - Solid waste depot: More than 500 but not more than 5 000 tonnes per year	125	
	0	
	0	
	0	
	0	
	0	
	0	
	0	
	0	
<i>Note: Amendment fee is determined by the category with the largest fee units</i>	Fee Payable	

Figure 1-6: Works Approval Fee Calculator outcome

2 Environmental Legislative Framework

Key legislative frameworks relevant to the proposed amendment and its application has been summarised in Table 2-1

Table 2-1: Relevant Environmental Legislation

Relevant Legislation	Environmental factor regulated/affected	Approvals or requirements
Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act)	Biodiversity / Flora / Fauna / Ecosystems	No impacts to Matters of National Environmental Significance (MNES) are anticipated as a result of the proposed activities for the Project.
Environmental Protection Act 1986 (Part IV) (EP Act)	Biodiversity / Flora / Fauna / Ecosystem Water Resources	Referral under Part IV of the EP Act is not required. No impacts to significant flora, fauna or ecological communities is expected from the proposed activities, hence the project is not considered to be a significant proposal.
Environmental Protection Act 1986 (Part V)	Water resources Landforms (contamination or pollution) Biodiversity / Flora / Fauna / Ecosystem	Provides for the prevention, control and abatement of environmental pollution, for the conservation, preservation, protection, enhancement and management of the environment and for matters incidental to or connected with the foregoing
Right in Water and Irrigation Act 1914 (RIWI Act)	Water Resources	Groundwater Licence GWL 163713 (3) will be surrendered to DWER. No new licence will be required for the new facility.
Aboriginal Heritage Act 1972 (AH Act)	Aboriginal Heritage	A section 18 consent has been obtained over the Project area. No heritage features have been identified near the proposed premises.
Environmental Protection Regulations 1987	Air	Provides details on the regulation and requirements for various land uses and potential sources of pollution pursuant to the EP Act. Part 3 of the regulation "control of pollution" premises in schedule 1 are prescribed premises for the purposes of Part V of the EP Act. Dust generation from construction will have an insignificant impact on the environment.
Environmental Protection (Noise) Regulations 1997	Noise	The Environmental Protection (Noise) Regulations 1997 outlines the acceptable limits on noise emission levels for various land uses and activities. Minimal noise will be expected from vehicle movement on site.

3 Stakeholder Engagement

Schutz has engaged with key stakeholders regarding the relocation of their operations. Stakeholders engaged include DWER and Schutz clients. The existing clients were informed of Schutz intension to relocate operations and the estimated timeframes of when the relocation is likely to occur. A detailed business case proposal was presented to different stakeholders, highlighting the need for the business to relocate, including advantages, costs and opportunities for business growth (Appendix A). A consultation was held with DWER representatives to understand the legal requirements for moving the facility. The outcomes of the meeting identified the operation required a works approval to be relocated and also highlighted the process for applying for a new works approval. In addition the applicant was advised to consider the suitability of the location prior to applying for the works approval and also consider controls for any potential emissions to the environment.

4 Existing Environment

4.1 Climate

The site is located within a Mediterranean climate, characterised with hot dry summers and moderately wet, mild winters. The nearest open weather station to the site is Jandakot Aero, Station No.009172. The average maximum temperature for the station is 31.7°C which is recorded in February, whilst the average minimum temperature is 7°C recorded in July (Bureau of Meteorology, 2024). The station receives a mean rainfall of 174 mm, and the mean number of days is 15.2 days.

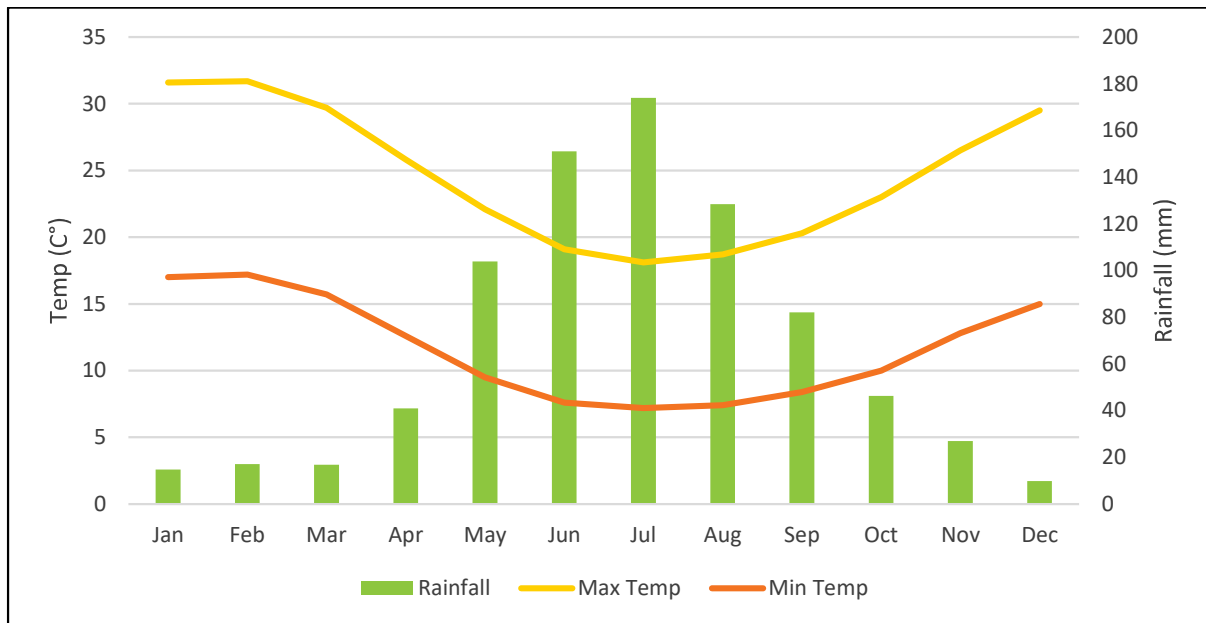


Figure 4-1: Mean minimum and maximum temperatures and rainfall for Station No. 009172

The average morning wind speed for the station is 15.8 km/h and during the afternoon the mean speed is 21.4 km/h, Figure 4-2 show the mean direction of the wind in the morning and afternoon.

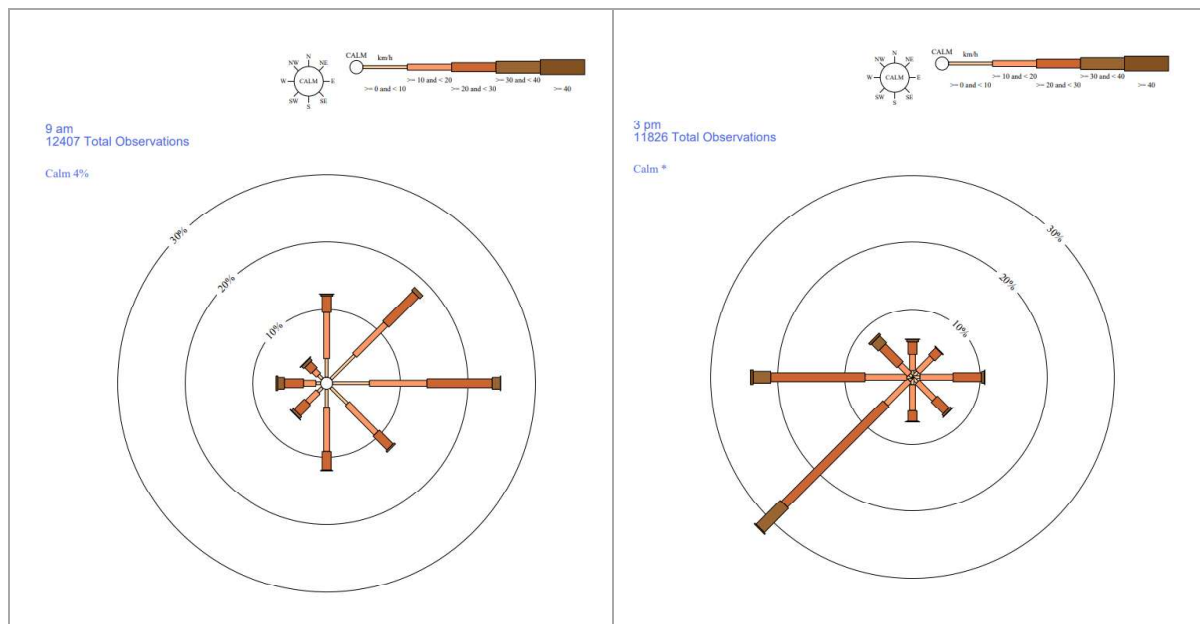


Figure 4-2: Mean morning and afternoon wind speed direction for the station.

4.2 Topography

The topography of the site has been greatly altered with historic quarrying activities, resulting in the lowest parts of the site having an elevation of 1 m AHD. The majority of the site is approximately 10 m AHD. The edges of the site are representative of natural surface with elevations grading from east to west, ranging in elevation from approximately 2 m AHD at Rockingham Road to 17 m AHD adjacent to the MKR (Development WA, 2020).

4.3 Geology and Soils

4.3.1 Landscape

The site has been used predominantly as a limestone quarry with layers of limestone removed. From observation, the site consists of a mix of consolidated limestone and sand. The perimeter of the site consists of a mix of the natural surface and a mix spoil removed during the process of quarrying (Talis 2021).

The site covers one geological unit **QTI** which is described as, unconsolidated to strongly lithified calcarenite with calcrete/kankar soils; aeolian. Locally quartzose, feldspathic, or heavy-mineral-bearing (Department of Primary Industries and Regional Development, 2017). The whole site has been historically cleared to accommodate previous land use activities.

4.3.2 Acid Sulfate soils

A review of the DWER's acid sulfate soils (ASS) mapping system shows that the site is not mapped within as ASS risk area (DWER 2017) (Figure 4-4). The site has been used predominantly as a limestone quarry with layers of limestone removed. The site consists of a mix of consolidated limestone and sand (Talis, 2021).

4.3.3 Contaminated Sites

There are no known contaminated sites listed in the DWER database as occurring in the site area (DWER ,2018). A known contaminated site located near the site is on Lot 51 Diagram 99704, approximately 0.32 km on the northeastern side. The contaminated site has been classified as Remediated for restricted use. In accordance with the Department of Health advice, 'if groundwater is being, or proposed to be abstracted, DWER recommends that analytical testing should be carried out to determine whether the groundwater is suitable for its intended use' (DWER, 2021). No groundwater abstraction and use will be carried out on site.

4.4 Hydrology

4.4.1 Groundwater

The site is located above the Valley Groundwater System, a part of the Cockburn Groundwater Area. The area is underlain with a superficial limestone, marl and cemented sand aquifer. The aquifer is recharged by rainfall and some upward leakage from the Leederville aquifer which is located further below (Development WA, 2020).

No Public Drinking Water Source Areas are mapped over the site (DWER, 2024). The surface geology is Tamala Limestone (QPCK) which can be described as predominantly calcarenite.

Three groundwater monitoring bores were installed on site by RPS and monitored for groundwater levels and quality on a monthly basis between October 2010 and May 2011. Groundwater has a very low gradient across the site, with a flow west toward the Cockburn Sound (Talis, 2021). Depth to groundwater ranges from a minimum of 6.27 m to a maximum of 6.61 m. Groundwater salinity ranges between 100-500 mg/L (DWER, 2024).

Post-development groundwater monitoring is proposed in all pre-development groundwater monitoring bores to provide suitable coverage of the Structure Plan area. Monitoring will be undertaken by the landowner/developer for three years post development consistent with DWER requirements (Development WA, 2020).

4.4.2 Surface water

No surface water features were identified on site. Site surface water runoff infiltrates through the sandy subsurface profile due to the depression caused by previous quarry works (Development WA, 2020).

The site does not contain any Geomorphic Wetlands of the Swan Coastal Plain (DBCA 2107). Two conservation category wetlands; Beeliiar Regional Park and Mount Brown Lake, are mapped 0.2 km and 0.1km respectively to the west of Rockingham Road and the site(Figure 4-3) These areas are situated upgradient of the site, and as such any surface run off or groundwater infiltration will not present a risk to these features. Stormwater across the site will be managed on site with no outlets proposed to other catchments or wetlands. All stormwater is to be infiltrated, and stormwater infiltration storage areas have been sized to infiltrate the 1 in 100-year ARI event (Talis, 2021). Due to the topography of the site, there is no overland flow route to divert stormwater exceeding the 1:100-year capacity.

4.5 Biological Values

4.5.1 Flora and Vegetation

The vegetation and flora within the site have been subjected to long term degradation processes such as resource extraction, horticultural industry, weed invasion, altered water regimes, fire and development, which has resulted in limited native remnant vegetation remaining. An aerial view shows that the site does not contain any vegetation.

4.5.2 Fauna

The site provides limited fauna habitat due to the extensive disturbance caused from quarrying activities. The site has been completely cleared and, as such, there is no ecological value for native fauna (Development WA, 2020).

4.6 Heritage

4.6.1 Indigenous heritage Sites

A search the Aboriginal Heritage Inquiry System (AHIS) did not identify any cultural places within the site. The nearest registered place (Thomsons Lake-ID 18938) is located approximately 1.27 km northeast of the site (Department of Planning, Lands and Heritage (DPLH, 19 February 2025).

4.6.2 Non-Indigenous Heritage Sites

A review of the State Heritage Office database (inHerit) did not identify any non-indigenous heritage places within the site (State Heritage Office,19 February 2025).

4.7 Bushfire Prone Area

The site is not currently designated as bush fire prone (Department of Fire and Emergency Services, 2024). No additional planning and building requirements may apply to development on this site. A bushfire hazard level assessment completed for the structure plan identified the majority of the area as having a Moderate or Low bushfire hazard level. Given that the site has been completely cleared, the post development state of the site will result in even lower hazard levels.

A Bushfire Management Plan has been prepared for the structure plan in accordance with the Guidelines for Planning in Bushfire Prone Areas (the Guidelines) to meet planning requirements triggered under State Planning Policy 3.7 *Planning in Bushfire Prone Areas* (Development WA, 2020). Any bushfire risks posed to future development by adjacent post development hazards will be managed through the standard application of acceptable solutions under the Guidelines, including provision for, and implementation of Asset Protection Zones, relevant bushfire building construction standards, provision of adequate emergency water supply and vehicular access, as well as through a direct bushfire suppression response if required (Development,2020).

Bushfire Attack Level (BAL) contour mapping prepared over the site demonstrates that minimum separation distances for a BAL-29 rating or lower can be achieved in the form of Asset Protection Zones consisting of either road reserves or building setbacks (Development WA, 2020). Potential areas impacted by a BAL-29 rating are minimal and the majority of Orion Industrial Park, Development Area

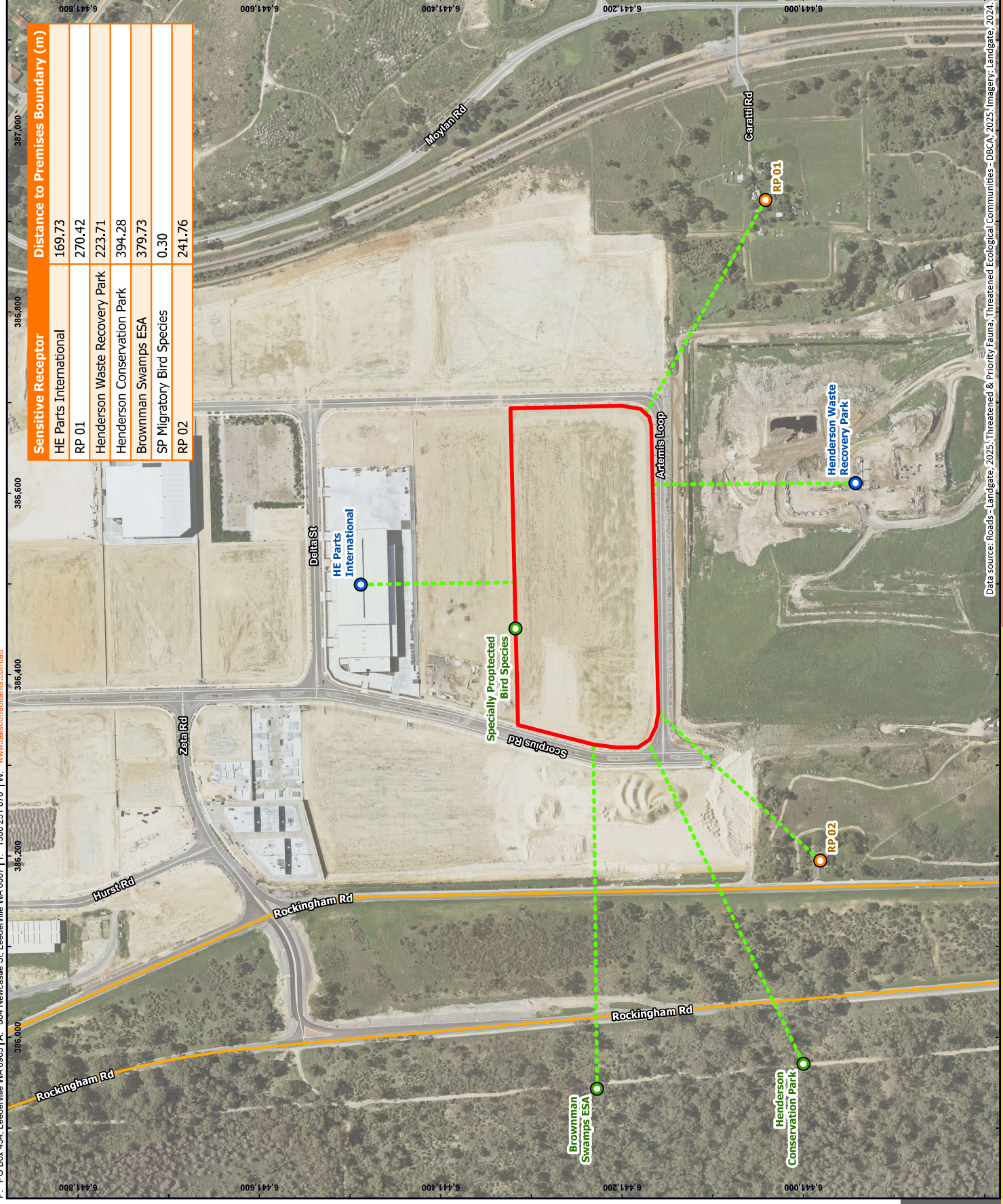
6A is subject to a BAL-Low rating, requiring no specific construction requirements (Development WA, 2020).

4.8 Sensitive Receptors

The nearest sensitive receptors are residential properties that lie within close proximity to the site (Figure 4-3). The closest residential properties (Lot 4, No. 900) Rockingham Road is located on the adjoining western boundary of the site approximately 227m. Residential property RP01 is located approximately 270 m to the southeast of the site.

There are existing rights in the Master Plan in accordance with clause 4.9 that allows the landowners to remain within the site area, sell property on a private market or participate in the development of the area. The existing owners are entitled to stay under the existing land use rights regardless of the rezoning.

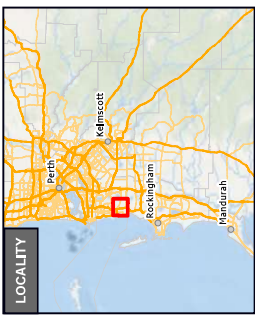
It is noted that the proposed subdivision drawings identify an internal road to be located between RP01 and the proposed Lot 517. However, given the history of these properties and the association the residents have with the land it can be assumed that the residential properties may remain and should be treated as sensitive receptors.



LEGEND

- Premises Boundary
- Separation Distance
- Western Australian Roads**
- Freeway / Highway
- Main Road
- Minor Road

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SENSITIVE RECEPTORS

Lot 517 on DP 425807

Works Approval
Schutz Australia Pty Ltd

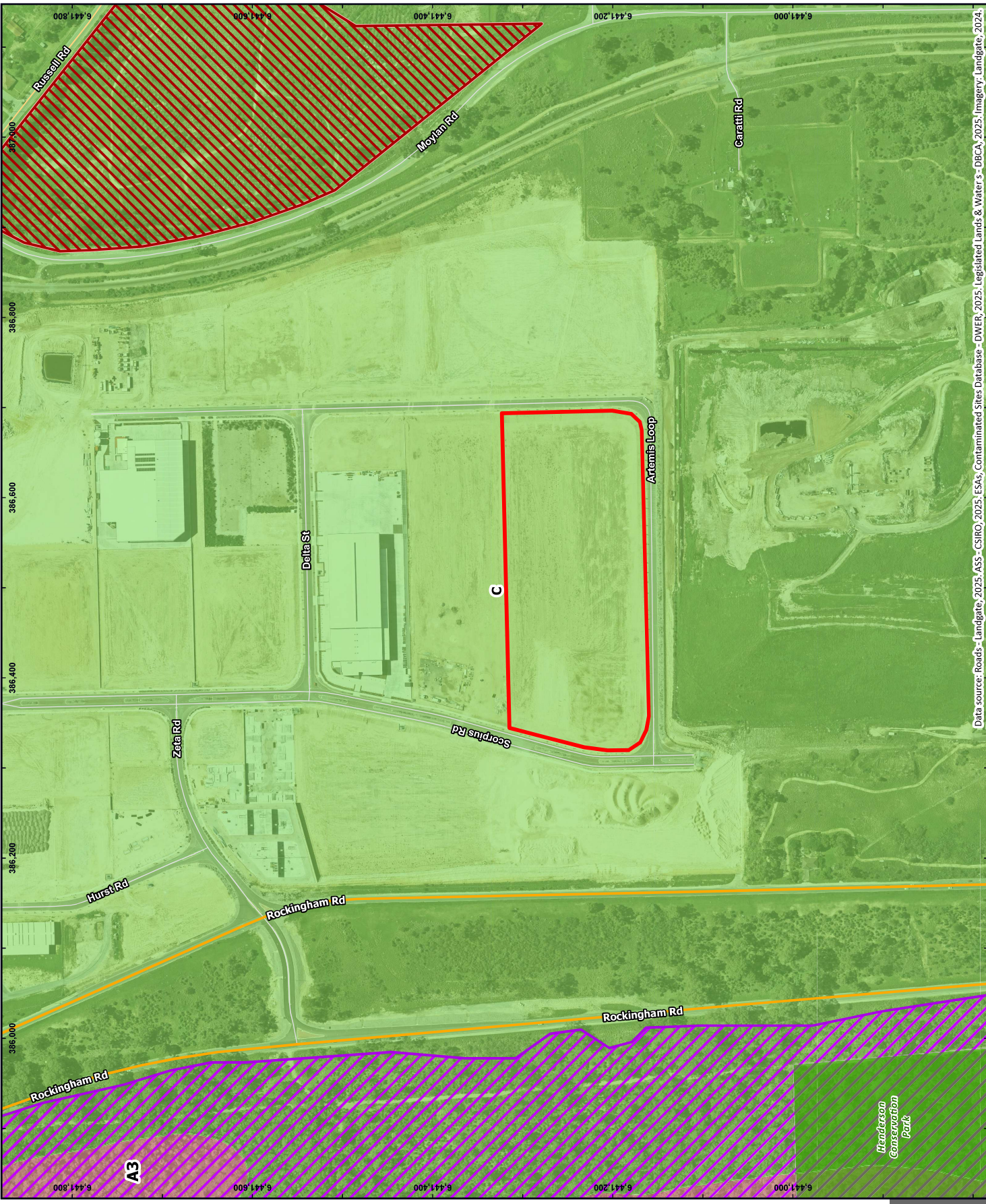


Coordinate System: GDA2020 MGA Zone 50
Scale: 1:14,800

Prepared: [Redacted] Date: 27/03/2025
Reviewed: [Redacted] Revision: A
Project: TE24133

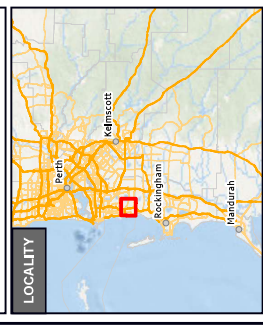


Figure 4-3



LEGEND

- Premises Boundary
- Environmentally Sensitive Areas
- Contaminated Sites Database
- Remediated for restricted use
- Acid Sulphate Soils**
- A3: High Probability / Low Confidence
- C: Extremely Low Probability (Confidence Level not Provided)
- Legislated Lands and Waters**
- Conservation Park
- Western Australian Roads**
- Freeway / Highway
- Main Road
- Minor Road



SURROUNDING ENVIRONMENT

Lot 517 on DP 425807
 Works Approval
 Schuitz Australia Pty Ltd

Prepared:	Date: 12/03/2025
Reviewed:	Revision: A
Project:	TE24103

Figure 4-4

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4.9 Risk Assessment Impacts

A risk assessment for all potential impacts has been conducted. Table 4-1 outlines the risk matrix used to determine the impact, while Table 4-2 and Table 4-3 describe the likelihood and consequence of each category respectively. Proposed controls to manage potential impacts associated with the proposed upgrade activities are included in Table 4-4 which also includes the residual risk level of each potential impact.

Table 4-1: Impact Assessment Matrix

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

Table 4-2: Likelihood Definitions of Risk

Descriptor	Explanation
Rare	May occur in exceptional circumstances (would be considered highly unusual); may occur in the next 30 - 40 years (<5% per year).
Unlikely	Not likely to occur; may occur within the next 10-20 years (5% - 10% probability).
Possible	May occur within 5 – 1- years (10% - 50% probability).
Likely	Known to occur or has occurred in the past; is likely to occur in the next 24 – 36 months (50 – 80% probability).
Almost Certain	Expected to occur in the next 12 – 24 months (80 – 100% probability).

Table 4-3: Risk Consequence Descriptors

Insignificant	Minor	Moderate	Major	Extreme
Flora and Vegetation				
Clearing of vegetation amounting to no more than 15% of total mapped.	Clearing of vegetation amounting to no more than 25% of total mapped.	Clearing of vegetation amounting to no more than 40% of total mapped.	Clearing of vegetation amounting to no more than 65% of total mapped.	Clearing of vegetation amounting to no more than 100% of total mapped.
No direct loss of significant flora in Disturbance Envelope although increased stress incurred through indirect or induced processes.	Minor, localised loss of significant flora either through direct, indirect, or induced processes.	Regional loss of significant flora with no impacts on species survival.	Project places significant pressure on continued survival of significant species.	Project results in extinction of significant species on a regional scale.
Terrestrial Fauna				
Localised and short-term loss of habitat that is well represented in the region, overall habitat area remains intact with minimal fragmentation.	Localised and medium-term loss of habitat that is well represented in the region, some short-term habitat fragmentation.	Localised and permanent or widespread and long-term loss of habitat that is not well represented in the region, medium term habitat fragmentation.	Permanent and widespread loss of habitat that is not well represented in the region, permanent habitat fragmentation.	Permanent loss and fragmentation of habitat that is not well represented in the region.
Surface Water				
Minor change to surface water quality within the project area that does not change its ability to be used by livestock and fauna	Minor change to surface water quality within the project area and downstream watercourses that does not affect its use by livestock and fauna.	Moderate change to surface water quality within the project area and downstream watercourses that affects short term use by livestock and fauna.	Decline in surface water quality in the project area and downstream watercourses that prevents medium to long term use by livestock and fauna.	Decline in surface water quality on a regional scale that prevents long term use by livestock and fauna.
Groundwater				

Insignificant	Minor	Moderate	Major	Extreme
Minor, localised change to groundwater quality that does not change its ability to be used by beneficial uses, including livestock or fauna.	Short-term localised decline in groundwater quality that affects beneficial uses, including livestock or fauna.	Medium-term localised decline in groundwater quality that affects beneficial uses, including livestock or fauna.	Short- to medium-term regional decline in water quality that prevents beneficial uses, including livestock or fauna.	Long-term regional decline in water quality that prevents beneficial uses, including livestock or fauna.
Minor changes to local groundwater levels/availability that do not affect beneficial uses, including livestock or fauna.	Local changes to groundwater levels/availability that do not affect beneficial uses, including livestock or fauna.	Local changes to groundwater levels/availability that affect beneficial uses, including livestock or fauna in the short to medium-term.	Regional changes to groundwater levels/availability that affect beneficial uses including livestock or fauna in the medium term.	Regional changes to groundwater levels/availability that affect beneficial uses, including livestock or fauna in the long term.
Land and Soils				
Minimal land pollution within Disturbance Envelope, easily treatable in short term and does not result in adverse impacts on associated environmental values.	Minimal land pollution localised and treatable in medium term. Does not result in adverse impacts on associated environmental values.	Localised, low level land pollution that results in adverse impacts on associated environmental values in the short to medium term.	Low level land pollution on a regional scale resulting in adverse impacts on associated environmental values requiring medium to long term management.	Mid-level land pollution on a regional scale resulting in permanent damage with severe environmental and socioeconomic disruption.
Air Quality				

Insignificant	Minor	Moderate	Major	Extreme
Minimal, short-term, and infrequent loss of amenity within the project area. Total Suspended Particles (TSP) and dust deposition guideline levels are not exceeded for sensitive receptors offsite.	Minimal and short-term, but frequent, loss of amenity within the local area. TSP and dust deposition guideline levels may be exceeded for sensitive receptors offsite, but this rarely occurs.	Medium-term and frequent low-level decreases in amenity within a local area. TSP and dust deposition guideline levels are exceeded occasionally for sensitive receptors offsite.	Medium-term, low-level decline in amenity within a regional area. TSP and dust deposition guideline levels are exceeded frequently for sensitive receptors offsite.	Long term, mid-level decline in amenity over a regional area. TSP and dust deposition guideline levels are exceeded almost constantly for sensitive receptors offsite.
Noise				
Noise levels remain below relevant guideline values at all locations. Minimal onsite impacts.	Noise levels remain below relevant guideline values at most locations, but some non-sensitive receptors impacted by minor exceedances. Minimal, localised impacts.	Occasional exceedance of relevant guideline values at sensitive receptor locations. Low level, localised impacts.	Frequent exceedance of relevant guideline values at sensitive receptor locations. Mid-level, localised impacts.	Continuous exceedance of relevant guideline values at sensitive receptor locations. High level localised impacts.

The construction of new facilities has potential to impact the environment through a number of different pathways. Mitigation strategies will be implemented to minimise these impacts and ensure that the proposed works can be undertaken with limited impact on the surrounding environment. An assessment of risks relating to the Works Approval is presented in Table 4-4.

Table 4-4: Risk Assessment for the proposed Works Approval

Sources	Risk	Potential Pathways	Mitigation Measures	Likelihood	Consequence	Risk Rating
Granulator/shredder And Air compressor	Noise emissions	Air/windborne	<ul style="list-style-type: none"> All equipment will be enclosed in an acoustic closure to limit noise emissions. Regular maintenance of equipment in accordance with the manufacturer requirements. Any noise complaints received to be recorded and investigated, and noise monitoring conducted if required. 	Possible	Minor	Low
Drum washing	Hydrocarbon or chemical spills	Surface runoff	<ul style="list-style-type: none"> Hydrocarbon or chemical spills reported internally and immediately cleaned up. All chemical substances will be stored within tanks or silos in appropriately bunded area. Water from washing drums will be directed to the wash water treatment plant and get disposed into the Water Corp sewer systems. 	Likely	Insignificant	Low
Vehicles transporting goods on and of site	Air emissions	Air	<ul style="list-style-type: none"> Investigation into opportunities for minimisation of emissions undertaken regularly. 	Likely	Insignificant	Low
Chemical residues from incoming drums	Odour	Air	<ul style="list-style-type: none"> Chemical handling is streamlined to minimise vapour generation Handling of incoming drums occurs within a shed 	Likely	Insignificant	Low

Sources	Risk	Potential Pathways	Mitigation Measures	Likelihood	Consequence	Risk Rating
Roof exhaust	Air emissions/pollution	Air	<ul style="list-style-type: none"> Roof exhaust fans to be installed to create forced air circulation inside the building. 	Possible	Minor	Low
General site operations	Spread of weed species	Vehicle movements across site	<ul style="list-style-type: none"> Disturbed areas will be periodically inspected to identify if weed species are present. Identified weeds will be sprayed or hand pulled. Majority of the premises will be paved, reducing potential weed growth 	Possible	Minor	Low
	Introduction of feral animals	Increase in feral fauna on site	<ul style="list-style-type: none"> Waste to be managed appropriately (i.e. lids in place on food waste bins). All sightings of feral fauna to be reported internally, and feral fauna management to be undertaken if necessary. 	Unlikely	Insignificant	Low

5 Management of impacts

Schutz is committed to adopting best practice environmental management and conducting its business with minimal impact on the local community. Potential emissions to air, land and water as part of the proposed relocation are anticipated to be minimal. Management of potential emissions on Premises will be control by Schutz’s contractor and aligned to their environmental policy (Appendix B). Some operational environmental management measures are summarised in Table 5-1

Table 5-1: Environmental Considerations and Management

Aspect	Receptors	Management
Air Quality (particulates and air toxics)	Personnel within the site. Nearby residents	Operational air emissions will be minimal and associated with the roof exhaust and from truck loading and unloading operations. No significant air emissions are expected from the proposed facility.
Odour	Personnel within the site. Nearby residents	Operational odour emissions will be negligible for nearby residents as most activities will be occurring in closed spaces and a roof exhaust will be added to the buildings to allow air circulation for site personnel. No significant odour emissions are expected from the proposed facility.
Noise	Personnel within the site. Nearby residents	As part of the operation of the proposed facility, no noise emissions are likely to be produced that will affect the amenity of nearby sensitive uses. Equipment that produces noise will be contained in built areas. Have a noise complaint register for nearby residents.
Discharges to Land	Personnel within the site. Nearby residents (more than 600 m from the site).	No discharges to land are expected from this operation: <ul style="list-style-type: none"> Waste sludge from drum cleaning will be dried and moved from site by a registered waste management company.
Liquid Waste	Personnel within the site. Nearby residents	No liquid waste is discharged to land from the proposed development. Waste water from drum washing will be discharged to the Water corporation sewer after a primary treatment in the site wastewater treatment plant and secondary treatment in the hydroxon plant.

6 Concluding Remarks

This report contains supporting information relating to an Application for a Works Approval to construct and operate a drum and container recycling business for Schutz within Orion Park.

The above assessment outlines the main impacts posed by the Works Approval Application through the proposed activities and are limited to:

- Noise from site equipment
- Air emissions from vehicle movement and roof exhaust
- Odour from chemical handling on site and wastewater from washing drums
- Hydrocarbon spillage from drum washing

The risk assessment completed for this application shows that the residual risk rating for all the identified impacts is low. The management measures proposed within this document ensure that there is no unacceptable risk to the environment due to the proposed operations within the proposed premises.

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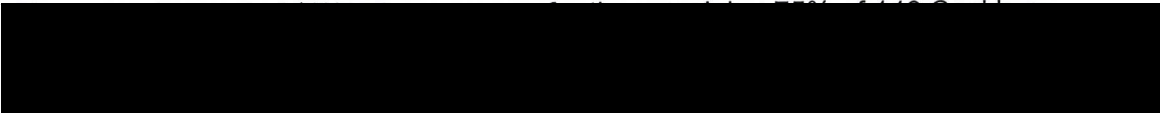
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APPENDIX A

Business Case for relocation of North Coogee Plant

Business Case for Relocation of North Coogee Plant (Western Australia)

Existing Property – North Coogee

- Buildings have been in existence for over 40 years and in need of repair. Some buildings contain asbestos. Shipping containers used for drum storage are in various states of disrepair
- Land is in process of being rezoned residential due to being plans for apartments/restaurants/shopping in area.
- We have approval only to continue our current operations in the near future. No approval will be given to amend existing buildings or install large equipment on site
- New housing developments have been developed to the north and south of our property less than 500m away
- Work is planned to begin in the near future on a community/school sports grass oval just 150 metres across the road from our SVR building
- Total occupied land space approx. 49,000 m2.
- Schütz Australia owns 100% of 152 Cockburn Road and 25% of 146 Cockburn Road.
- 
- Offers have be made by external parties on the nearby South Fremantle Power Station to redevelop the property. This should increase our land value in the medium term.
- Land is classified as possibly contaminated from the previous steel drum reconditioning use. Once buildings are demolished, we can conduct soil remediation to get property ready for sale.

Satellite Photo of Existing Property



142 Cockburn
Road – rented
14,300 m²

146 Cockburn
Road 25%
owned

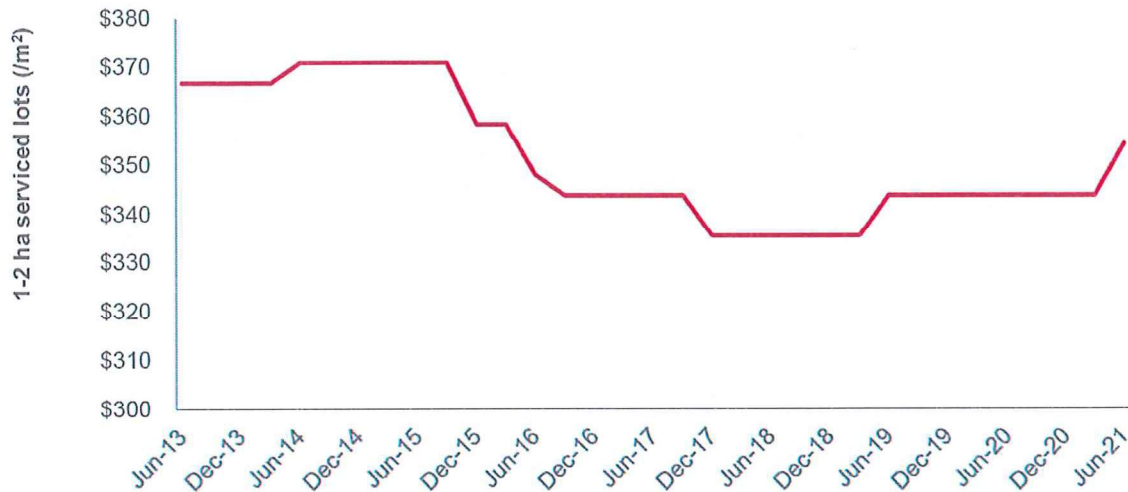
14,300 m²

152 Cockburn Road 100% owned
21,300 m²

Land Opportunity

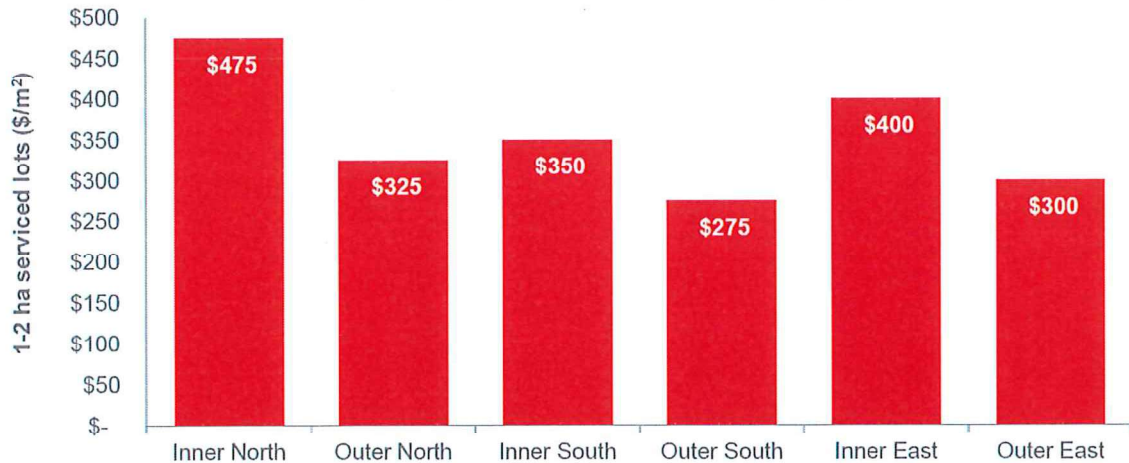
The average Perth land value for 10,000 to 20,000 m² lots is around ██████ m². This has increased from a low of ██████ in 2018. Sentiment in industrial property in WA has increased in the March 2021 quarter and is expected to continue to increase in 2021 and 2022. The most expensive land is in the Inner North region. We are searching for land in the Outer South Region which is the cheapest region.

Perth Land Values (1-2 ha lots)



Source: PVA(WA) Research

Perth Land Values - June 2021 Quarter



Source: PVA(WA) Research

After a comprehensive search of suitable land in the Perth Metropolitan Area over the last 12 months, we have selected land in the Orion Industrial Park which is part of the Latitude 32 Development south of Perth near Kwinana. The property is owned by Development WA, a State Government organisation. This property was selected for the following reasons:

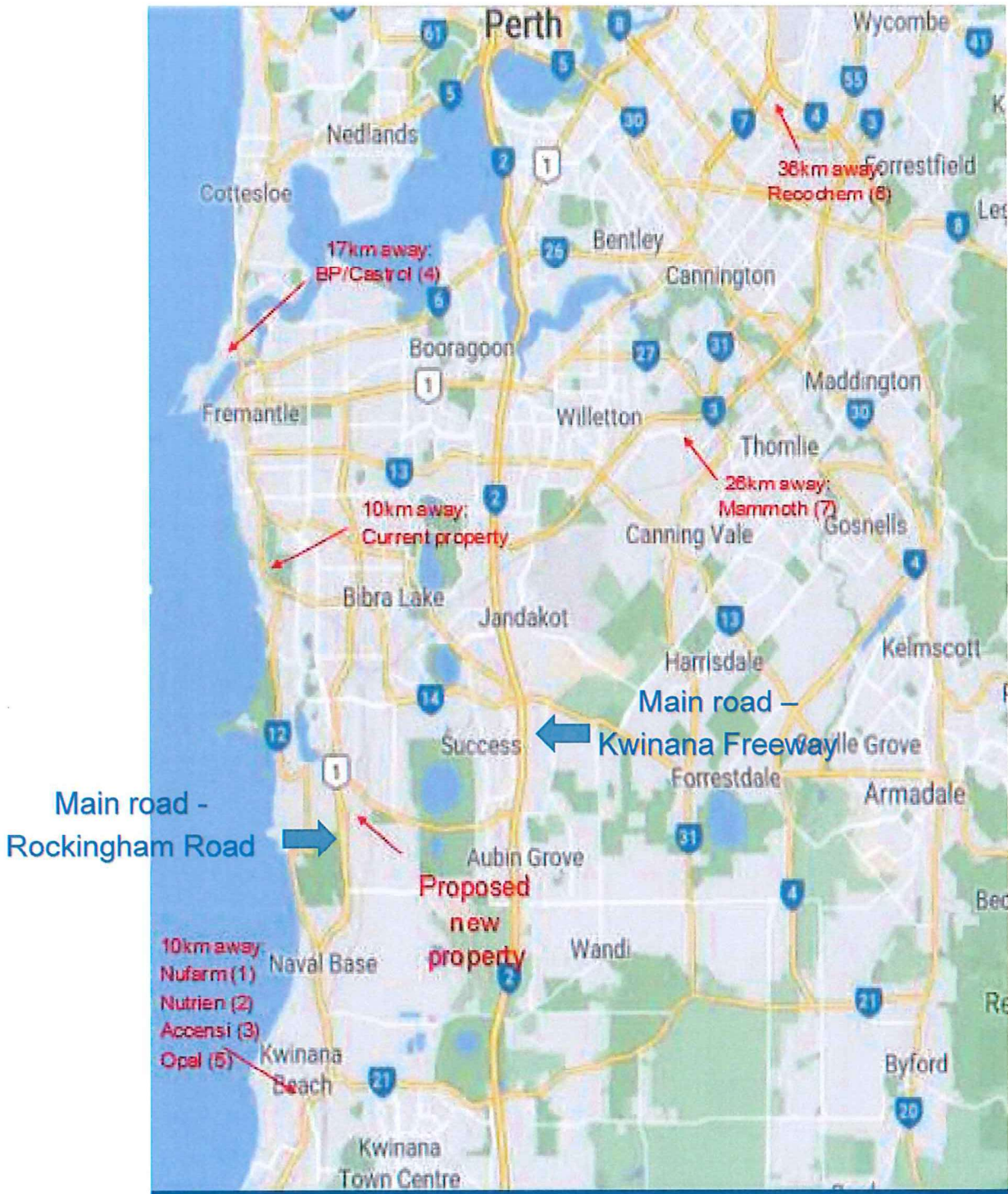
- Zoned for general industrial use therefore suitable for our proposed manufacturing and reconditioning operations

- Former limestone quarry which is suitable for heavy industrial buildings, no land contamination
- Closer to most of our major customers compared to our current location
- Approx. 10 min from our current location.
- Good transport infrastructure – wide roads suitable for heavy vehicles
- Good employment base
- Priced at below average for Perth industrial land
- No other suitable land available – could be a few years away before more land is available for sale

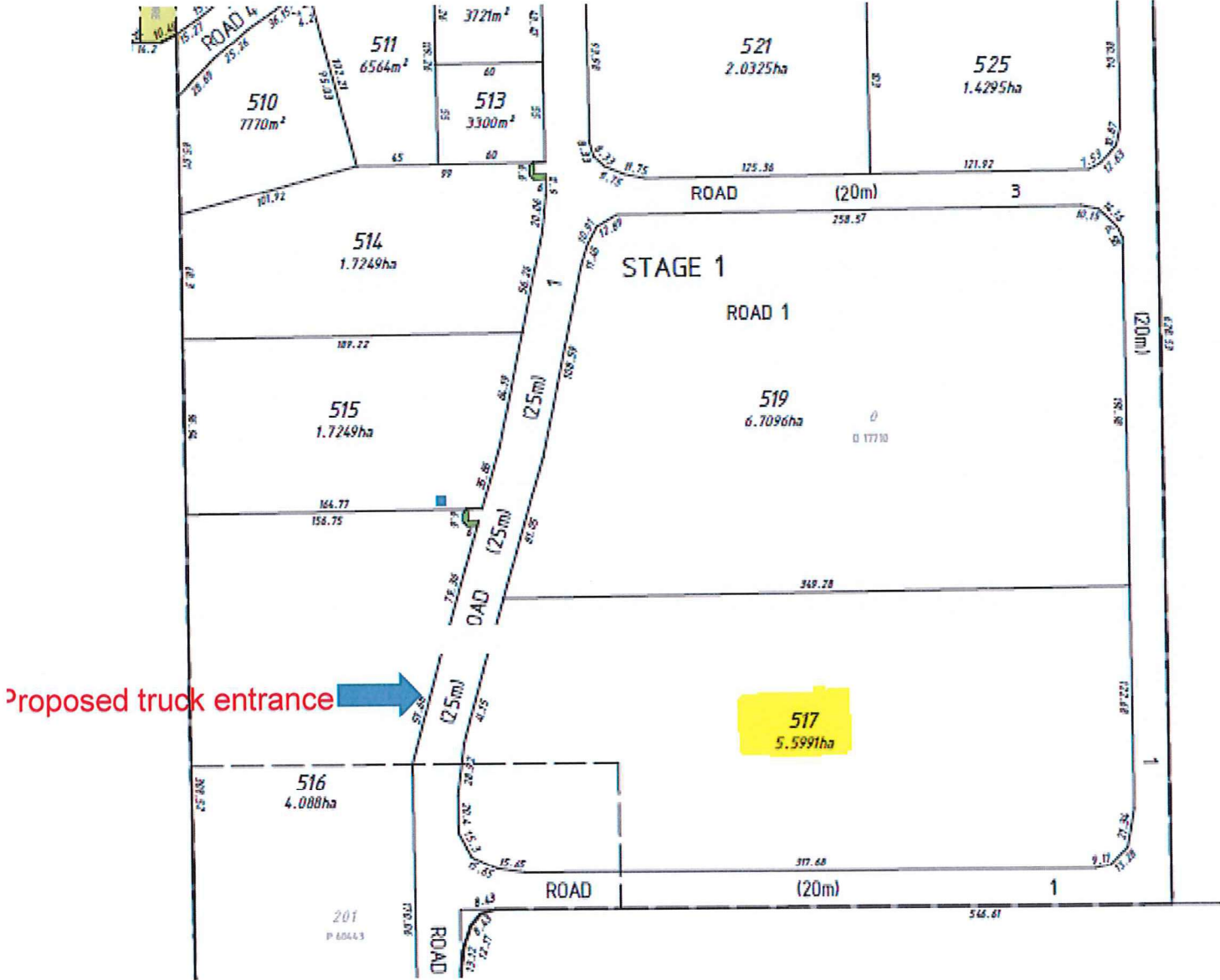


Top 7 Customers in relation to the Orion Industrial Park (Proposed Location)

Ranked in order of most sales, shows distance from proposed location

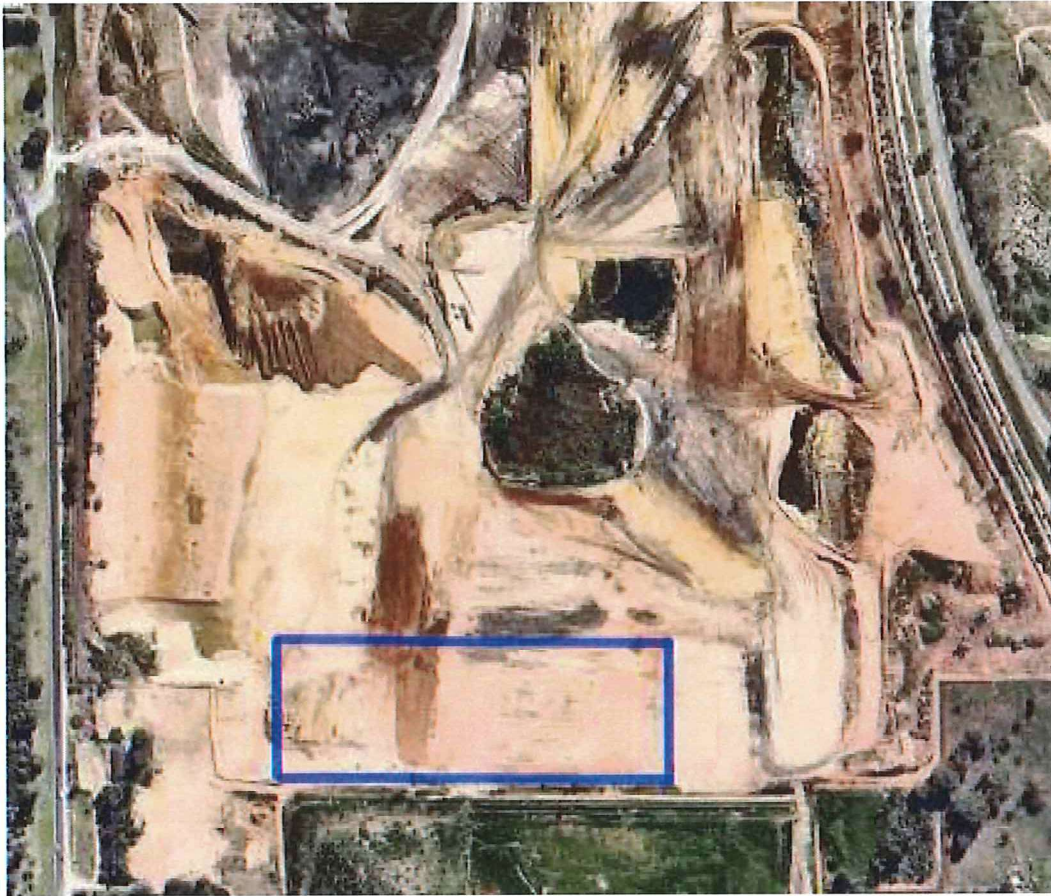


We have placed an offer for Lot 517 below at 55,991 m² for [REDACTED] (per m²), subject to Board Approval. Dimensions are approx. 350m x 100m.



Road network is good – all roads are suitable for B-Double Trucks.

Lot 517 Aerial Photograph



Neighbouring properties

- The property to the north (Lot 519) has been sold to a developer. The proposed tenant is a major international company – parts and servicing centre for mining equipment.
- The property to the south is a disused Landfill site.
- No information has been given about the smaller properties west and further north of our location – most of the properties are still available for sale.

Details of proposed contract with Development WA

Total price [REDACTED]

Transfer duty (government tax) payable on property settlement, approx. [REDACTED]

Deposit 5% ([REDACTED] payable on successful acceptance of offer.

Refundable until 24 September (last date for Board Approval)

After this, 50% of deposit is non-refundable (\$ [REDACTED]). The remaining 50% is non-refundable after completion of environmental and planning due diligence by 29 October.

A further 5% Deposit is required 6 months after date of contract (\$ [REDACTED])

The deposit is non-refundable due to Development WA's government policy that properties over \$ [REDACTED] must have a non-refundable deposit to mitigate the risk of the other party withdrawing from the contract. Also, they will be spending money on developing the land to suit our requirements (flat land with a retaining wall on northern and eastern boundary).

We have 95% confidence at this stage that we will get planning and environmental approval. Our discussions with the relevant authorities indicate there are no concerns. This will increase to 99% confidence once due diligence is completed by October.

Timeline

17 September (approx.) – 5% Deposit paid

24 September – Last date for Board approval

15 October - Legal and Environment due diligence completed, receive Foreign Investment Review Board approval

15 November – Lodge Planning and Environmental Approvals

March 2022 – Receive Planning and Environmental Approvals

March 2022 – Further 5% Non-Refundable Deposit paid

December 2022 – Certificate of Title Available – Remaining amount payable (settlement)

December 2024 – Latest date for commencement of building construction (within 24 months of settlement date)

December 2025 – Latest date for completion of building construction (within 36 months of settlement date)

APPENDIX B

Environmental Policy



ENVIRONMENTAL POLICY

Auspan Group recognises the importance of protecting the environment for the benefit of our clients, employees, shareholders and the community. Our commitment is to deliver our projects in an environmentally responsible manner.

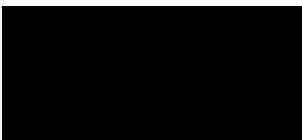
The Senior Management Team will also support other relevant management roles to demonstrate their leadership as it applies to their area of responsibility. Senior management will also ensure the integration of the environmental management system into the organisations business processes and promote the use of a process approach and risk-based thinking.

Auspan Group maintains processes and systems appropriate to our area of operations with the objective of providing the framework and platform to:

- Recycle as much of our waste material as practicable across the company.
- Receive no environmental breaches.
- Maintain an Environmental Management practices in alignment with ISO 14001:2015.
- Achieve sustainability through the effective and efficient use of resources.

In meeting these objectives, Auspan Group will manage and maintain an environmental management system structured on ISO 14001:2015, where we will:

- Conducting regular environmental inspections and audits of our operations to ensure waste and pollution are prevented or minimised.
- Complying with all relevant environmental legislation, regulations, codes of practice and contractual conditions.
- Continually monitor and improve our environmental management systems via auditing and performance monitoring reviews.
- Provide workers with necessary resources, information, instruction, training, and supervision to ensure their understanding and compliance with our Environmental Policy.



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26/07/2022

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