



## Application for Licence Amendment

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

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<b>Licence Number</b>	L8871/2014/1
<b>Licence Holder</b>	Suez Recycling & Recovery (Perth) Pty Ltd
<b>ACN</b>	115 821 255
<b>File Number</b>	DER2014/002858-1
<b>Premises</b>	North Bannister Resource Recovery Park 6264 Albany Highway North Bannister WA 6390
<b>Date of Report</b>	17 February 2021
<b>Decision</b>	Revised licence granted

#### **MANAGER WASTE INDUSTRIES**

#### **REGULATORY SERVICES**

an officer delegated under section 20 of the *Environmental Protection Act 1986* (WA)

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## 1. Decision summary

Licence L8871/2014/1 is held by Suez Recycling & Recovery (Perth) Pty Ltd (Licence Holder) for the North Bannister Resource Recovery Park (the Premises), located at 6264 Albany Highway, North Bannister, WA 6390.

This DWER initiated Amendment Report documents the assessment of potential risks to the environment and public health from the proposal to transport up to 100 tonnes of high-risk category clinical waste to the North Bannister Waste Facility for disposal by burial, for a period of 4 weeks. As a result of this assessment, Revised Licence L8871/2014/1 has been granted.

This Amendment Report documents the amendments made pursuant to section 59 and 59(B) of the *Environmental Protection Act 1986* (EP Act).

## 2. Scope of assessment

### 2.1 Regulatory framework

In completing the assessment documented in this Amendment Report, the department has considered and given due regard to its Regulatory Framework and relevant policy documents which are available at <https://dwer.wa.gov.au/regulatory-documents>.

### 2.2 Amendment summary

On 8 February 2022, the department initiated an amendment to Licence L8871/2014/1 to allow for the short term acceptance of high-risk clinical waste at the North Bannister Resource Recovery Park. No changes to throughout or categories have been included within the amendment.

### 2.3 Background

As there is currently no medical waste incineration facility established in Western Australia, clinical waste management operators rely on rail transport to move high-risk category clinical waste, generated from public and private medical facilities, to incineration facilities located in the eastern states. Flooding events in southern areas of Western Australia have caused significant damage to the Trans-Australian Railway and haulage roads between Western Australia and South Australia. This has prevented all interstate rail movements and restricted truck movement between Western Australia and South Australia.

To prevent public health and environmental risk associated with the interim storage of the waste at Suez's Welshpool transfer station, Suez contacted DWER to seek advice on whether there are any constraints relating to the transport of high-risk category clinical waste to Suez's North Bannister Resource Recovery Park for deep burial (landfilling).

Suez advised that the proposal to dispose of high-risk category clinical waste by deep burial, would be temporary and only until the rail line is operational and the waste can be accepted for incineration in South Australia, in accordance with the "*Code of Practice for Clinical and Related Waste Management, Public Health Act 2016*." It has been estimated that 80 to 100 tonnes of waste require an immediate management solution over a four week period.

## 3. Risk assessment

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guideline: Risk assessments* (DWER 2020). To establish a Risk Event there must be an emission, a receptor which may be exposed to that emission through an identified actual or likely pathway, and a potential adverse effect to the receptor from exposure to that emission.

DWER sought advice from the Department of Health (DOH) on whether the disposal of high-risk category clinical waste presents any additional risk to the environment and public health. DOH responded to the department's request for advice on 8 February 2022 approving the short term disposal of high-risk clinical waste according to the conditions outlined in Table 1 below:

**Table 1: Department of Health advice/conditions**

Advice/conditions	
Site	North Bannister Resource Recovery Park – Class III landfill Cell.
Waste	High-risk clinical waste
Duration	4 February 2022 to 7 March 2022 Subject to when rail line is operational and when clinical wastes can be accepted and disposed of by incineration as required by the Code of Practice. Any extension past 7 March 2022 requires further DOH approval.
Conditions	All clinical wastes to be handled, transported and disposed of in accordance with the code of practice for Clinical and Related Waste Management and also subject to the following: <ul style="list-style-type: none"> <li>• High-risk clinical wastes to be disposed of via deep burial (rather than incineration);</li> <li>• Such wastes to be buried in the original unopened sealed containers/packaging;</li> <li>• Quantities of high-risk clinical waste to be recorded;</li> <li>• Auditable tracking documentation of all clinical waste to be retained and supplied to generators of high-risk clinicals wastes; and</li> <li>• Location of burial cells to be recorded and monitored for seepage.</li> </ul>

DOH stated that the resumption of standard disposal methods (incineration) should occur as soon as the eastern transportation route reopens and that any extension or further amendment to the above listed arrangements will require additional approval.

The short-term acceptance of high-risk clinical waste does not change the risk assessment previously undertaken for the receipt of clinical waste already approved under the licence. Additional controls will be added to the licence to ensure the high-risk clinical waste is received and processed in accordance with the DOH approval.

## 4. Consultation

Table 2 provides a summary of the consultation undertaken by the department.

**Table 2: Consultation**

Consultation method	Comments received	Department response
<i>Department of Health (DOH) advised of proposal to transport up to 100 tonnes of high-risk category clinical waste to the North Bannister Waste Facility for disposal by burial on 4 February 2022</i>	<i>DOH replied on 8 February 2022 approving the short-term disposal of high-risk clinical waste subject to conditions.</i>	<i>The Delegated Officer has considered the comments received in setting additional licence conditions for the acceptance and burial of high-risk clinical wastes.</i>
<i>Licence Holder was provided with draft amendment on 11 February 2022</i>	<i>The Licence Holder accepted all amendments and waived the remaining comment period on 15 February 2022</i>	<i>N/A</i>

## 5. Conclusion

Based on the assessment in this Amendment Report, the Delegated Officer has determined that a Revised Licence will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

### 5.1 Summary of amendments

Table 3 provides a summary of the proposed amendments and will act as record of implemented changes. All proposed changes have been incorporated into the Revised Licence as part of the amendment process.

**Table 3: Summary of amendments to licence conditions in this amendment**

Existing condition	Condition summary	Summary of amendments
<i>Condition 1 (Table 1.1)</i>	<i>Solid waste acceptance table</i>	<i>Inclusion of high-risk clinical waste acceptance specifications including approved duration.</i>
<i>Condition 11 (Table 3.1)</i>	<i>Solid waste processing table</i>	<i>Inclusion of high-risk clinical waste process specifications.</i>
<i>Condition 13 (Table 4)</i>	<i>Cover requirements table</i>	<i>Inclusion of cover requirements for high-risk clinical waste.</i>
<i>Condition 25 (Table 11)</i>	<i>Monitoring of inputs and outputs table</i>	<i>Inclusion of monitoring of waste inputs for high-risk clinical waste.</i>
<i>Condition 33</i>	<i>Record keeping</i>	<i>Record keeping requirements for the disposal of clinical waste</i>
<i>Definitions (Table 17)</i>	<i>Defined terms specified in the licence</i>	<i>Definition included for 'High risk clinical wastes', with reference to the DOH Code of Practice for Clinical and Related Waste Management, Public Health Act 2016.</i>  <i>Definition included for the DOH Code of Practice for Clinical and Related Waste Management, Public Health Act 2016.</i>

## References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. Department of Health (DOH) 2021, *Code of Practice for Clinical and Related Waste Management*, Perth Western Australia.
3. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
4. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Risk Assessments*, Perth, Western Australia.
5. Department of Water and Environmental Regulation (DWER), June 2019. *Guideline: Decision Making*, Perth, Western Australia.