



Application for Licence Amendment

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

Licence Number	L7021/1997/15
Licence Holder	City of Karratha
Application number	APP-0032549
Premises	Seven Mile Waste Disposal Facility Seven Mile Road GAP RIDGE WA 6714 Legal description - Lot 85 on Plan 180017 and Lot 552 on Plan 71049 As defined by the premises map attached to the revised licence
Date of Report	09 June 2026
Decision	Revised licence granted

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1. Decision summary

This amendment report documents the assessment of potential risks to the environment and public health from proposed changes to the emissions and discharges during the operation of the premises.

The delegated officer has granted revised licence L7021/1997/15.

Previous decision or amendment reports relating to the licence will remain on the Department of Water and Environmental Regulation (the department) website for future reference and will act as a record of the delegated officer's decision making.

2. Scope of assessment

2.1 Regulatory framework

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

2.2 Amendment summary

Licence L7021/1997/15 is held by the City of Karratha (licence holder) for the Seven Mile Waste Disposal Facility (the premises), located at Seven Mile Road, Gap Ridge.

The premises relates to the categories and the assessed production and design capacities under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) which are defined in licence L7021/1997/15.

On 21 November 2025 the licence holder applied to amend licence L7021/1997/15 under section 59B of the *Environmental Protection Act 1986* (EP Act). The amendment is in relation to:

- The removal of Category 67A composting activities as the licence holder is no longer composting FOGO or GO wastes.
- The addition of Category 13 for the crushing of C&D wastes prior to landfilling.
- Reducing the approved quantity of tyres being stored under Category 57 and authorisation for shredding the tyres prior to landfilling.
- Shredding of green waste and wood waste prior to offsite reuse and shredding mattresses to recover recyclable steel prior to landfilling.
- Establishing a quarantine zone for contaminated solid wastes prior to landfilling.

Additional information was obtained from the licence holder during a phone meeting on 15 January 2025 and in subsequent email correspondence dated 13 February 2025, 10 March 2026, 17 March 2026, 26 March 2026 and 9 April 2026 which is discussed further below.

The department notes the landfill gas management plan required by condition 38 was provided by Talis Consultants on 28 June 2024. The Delegated Officer will review the recommendations of the report to determine if current regulatory controls are sufficient for ongoing operation of the landfill gas extraction system (see Section 5).

This amendment is limited to reducing Category 57 and increasing Category 61A from the previously assessed design capacities and removing Category 67A as outlined in Table 1. This amendment maintains the previously assessed production/design capacities for categories 61, 62 and 64 which continue to apply under the revised licence without any

changes.

Table 1: Approved and proposed premises production and design capacity changes

Prescribed premises category description	Approved production/design capacity	Proposed production/design capacity	Description of proposed amendment
Category 57 Used tyre storage	200,000 tyres at any one time	240 tyres at any one time	Reduction in the number of tyres stored prior to shredding under Category 61A and landfilling under Category 64
Category 61 Liquid waste facility	116,500 tonnes per annual period	No change	N/A
Category 61A Solid waste facility	10,000 tonnes per annual period	12,000 tonnes per annum	Increase in the volume of waste types being shredded prior to offsite reuse or landfilling.
Category 62 Solid waste depot	20,000 tonnes per annual period	No change	N/A
Category 64 Class II or III putrescible landfill site	150,000 tonnes per annual period	No change	N/A
Category 67A Compost manufacturing and soil blending	5,000 tonnes per annum	N/A	Category proposed for removal

2.2.1 Removal of Category 67A composting activities

The licence holder has advised they are no longer undertaking composting activities at the premises and wish to have the category and associated conditions removed from the licence. The licence holder has provided photographic evidence that all processing and composting equipment, waste and product stockpiles have been removed from the premises and the remaining hardstand has been cleaned and decontaminated.

The department clarified with the licence holder if they still intended to compost biosolids from any onsite pond desludging activities, as authorised by condition 9 Table 3. The licence holder confirmed they will no longer be conducting any composting at the premises, including of biosolids.

The licence holder has advised they wish to shred green waste for reuse as mulch within municipal parks and gardens. As the green waste will not be composted, Category 67A does not apply. The shredding of green waste for reuse as mulch will be regulated under Category 61A and is discussed in section 2.2.4.

2.2.2 Category 13 for crushing of C&D wastes

The licence holder originally applied to add Category 13 for the crushing of up to 15,000 tonnes per annum of C&D wastes, prior to the crushed material being used for construction and maintenance of internal premises roads. They intend to conduct the crushing with a Hammel 950DK Shredder which is existing equipment located at the premises.

Upon further review of current management practices at the premises, the licence holder

advised that where possible C&D waste is not accepted at the premises and that waste generators are directed to other licensed premises in Karratha for recycling of C&D waste. As the amount of C&D waste likely to be received at the premises is very minimal, the licence holder has determined crushing the waste is not necessary and has requested this item be removed from the licence amendment.

Category 13 crushing activities will not be assessed in this amendment report.

2.2.3 Reducing the approved quantity of tyres being stored under Category 57 and shredding of tyres under Category 61A

In anticipation of the construction of a waste to energy plant in Karratha, the licence holder started stockpiling tyres in 2015 under a contractual agreement with the plant owners. In 2019 the agreement fell over due to failure to meet the contract. This left the licence holder with an excessive stockpile of used tyres, which continued to grow daily.

It was noted during the 22 May 2019 inspection that several of the tyre stockpiles on the premises exceeded the dimensions specified within licence conditions. The storage was also contrary to the requirements outlined to the Department of Fire and Emergency Services *Guidance Note: GN02 Bulk storage of rubber tyres included shredded and crumbed tyres* (GN02). Additionally, the licence holder has calculated that the existing licence throughput limit of 174,000 tyres per annual period was not adequate to cover the number of tyres currently stored or received annually at the premises, therefore applied to increase the Category 57 capacity to 200,000 tyres (or equivalent) stored on-site at any one time.

This amendment was to account for the number of tyres currently being stored, additional receivals and those processed at the facility and allow the premises to remain compliant while existing tyre stockpiles were reduced in size through shredding.

The licence holder prepared a *Tyre Reduction Plan* (City of Karratha, 2020, updated 2021) to actively work towards reducing the tyre stockpiles and has since achieved their goal.

Subsequently, the licence holder has reviewed management practices at the premises and intends to store no more than 720 tyres at any one time under Category 57. The tyres will be stored within three hook bins and once the bins are at capacity the onsite the Hammel 950DK Shredder will be used to shred the tyres. The tyre shred will be stockpiled until all tyres are shredded, whereby the shred will be transferred by loader or moxy mover to the active Inert Waste landfill cell by the end of the working day. The individual trench disposal system is no longer used, rather the tyre shred is sequentially deposited and covered daily within the landfill cell.

The licence holder has provided a Tyre Fire Management Plan to mitigate the risk of fires.

2.2.4 Shredding of green waste and wood waste under Category 61A

The licence holder has been shredding green waste and wood waste with the Hammel 950DK Shredder and stockpiling the shred at the premises. The shredding activities fall under Category 61A, therefore the licence holder has requested this activity be added to the licence.

The majority of the shred is despatched offsite to the Karratha Waste Handling Facility operated by Cleanaway under licence L8848/2014/1 for reuse as absorption material for liquid waste. The licence holder advised that Cleanaway took a total of 2,900 tonnes of shred during 2025.

The licence holder has advised that chemically treated timber pallets are not accepted at the premises. Contaminated green waste or wood waste is not shredded for the purpose of reuse.

Once the shred has been used for absorption it undergoes testing to ensure compliance with the requirements of the *Landfill Waste Classification and Waste Definitions 1996* (DWER, 2019) and is then returned to the premises for disposal under Category 64 within the Class III

landfill cell.

The licence holder intends on reusing smaller quantities of uncontaminated, shredded green waste as a raw mulch within municipal parks and gardens. The shredding and reuse of green waste will be assessed in accordance with the *Guideline: Better practice organics recycling* (DWER, 2022).

Aerial imagery indicates that there is a large stockpile of wood shred currently at the premises. The licence holder has advised they intend on implementing management strategies to ensure the current wood shred stockpiles are reduced to meet storage requirements of 30 m long, 10 m wide and 5 m high with a minimum clearance of 6 m between and around stockpiles, to mitigate the risk of fire. They anticipate achieving this by 30 June 2026.

2.2.5 Shredding of mattresses prior to landfilling under Category 64

The licence holder has been stockpiling mattresses prior to shredding with the Hammel 950DK Shredder under Category 61A to recover metals for recycling, with the shred being landfilled under Category 64. Shredding prior to landfilling ensures stability of the landfill mass and subsequently the landfill cap.

The licence holder has requested that shredding of mattresses under Category 61A be added to the licence.

The licence holder has advised they intend on implementing management strategies to ensure stockpiles of mattresses are regularly shredded and landfilled. They intend on stockpiling no more than 100 mattresses in piles of 10, with mattresses not being stored for longer than 30 days. Mattresses are wetted down prior to shredding to mitigate dust emissions.

2.2.6 Quarantine zone for contaminated solid wastes

The licence holder has advised that contaminated solid waste loads are tested prior to being accepted at the premises, to determine initial compliance with Class III requirements of the *Landfill Waste Classification and Waste Definitions 1996* (DWER, 2019).

They have advised they intend on conducting occasional quality assurance spot checks of incoming wastes to confirm compliance, prior to that waste being landfilled for due diligence purposes. The waste is stored atop the current active Class III landfill cell while awaiting secondary testing.

The application also included the need for storing contaminated wastes that require further drying out. The licence holder has subsequently advised this is incorrect and that this sort of waste is not intended for acceptance at 7 Mile as it is not considered solid waste. This portion of the application is withdrawn, therefore will not be assessed in this amendment report.

3. Risk assessment

The delegated officer 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.

3.1 Source-pathways and receptors

3.1.1 Emissions and controls

The key emissions and associated actual or likely pathways during premises operation which have been considered in this amendment report are detailed in Table 2 below. The control measures the licence holder has proposed to assist in controlling these emissions, where necessary are also detailed in Table 2.

Table 2: Proposed licence holder controls

Sources	Emission	Potential pathways	Proposed controls
Operation			
Shredding of green waste and wood waste	Noise	Air/windborne	<ul style="list-style-type: none"> Premises siting. Equipment use will be limited to operational hours only. Equipment and machinery to be maintained in good working order.
	Leachate	Subsurface seepage	<ul style="list-style-type: none"> Chemically treated timber pallets are not received at the premises. Existing stockpiles to be reduced to 30 m long by 10 m wide by 5 m high by 30/06/2026 and ongoing thereafter.
	Unauthorised fires – smoke and fire spread	Air/windborne	<ul style="list-style-type: none"> Existing stockpiles to be reduced to 30 m long by 10 m wide by 5 m high with a 6 m separation between and around stockpiles by 30/06/2026 and ongoing thereafter. Existing fire suppression equipment to be utilised in the event of a fire. Existing fire equipment is regularly serviced and maintained.
	Contaminated firewater and stormwater	Overland flow, subsurface seepage	<ul style="list-style-type: none"> Stormwater is diverted away from waste storage areas. Contaminated fire water will be diverted and contained in the surface water management system. It will then be transferred to the onsite liquid waste ponds for disposal via evaporation.
	Product quality – mulch	Discharge of contaminants to land through application of physical, chemical and/or biological contaminated products	<ul style="list-style-type: none"> Limited to shredded green waste only. Limited application to parks and gardens under the control of the licence holder.

Sources	Emission	Potential pathways	Proposed controls
Storage and shredding of mattresses	Noise	Air/windborne	<ul style="list-style-type: none"> Premises siting. Equipment use will be limited to operational hours only. Equipment and machinery to be maintained in good working order.
	Dust, particulates and windborne wastes	Air/windborne	<ul style="list-style-type: none"> Mattresses to be wetted down prior to shredding and disposed of to the Class III landfill cell immediately after shredding. Cease shredding during strong winds. Windblown waste is regularly collected and returned to the landfill cell.
	Leachate	Subsurface seepage	<ul style="list-style-type: none"> Storage of mattresses will be limited to 10 mattresses per stockpile, and 10 stockpiles. Mattresses to be stored for no longer than 30 days. Mattress shred to be disposed of to the Class III landfill cell immediately after shredding.
	Unauthorised fires – smoke and fire spread	Air/windborne	<ul style="list-style-type: none"> Storage of mattresses will be limited to 10 mattresses per stockpile, and 10 stockpiles. Mattresses to be stored for no longer than 30 days. Mattress shred to be disposed of to the Class III landfill cell immediately after shredding. Existing fire suppression equipment to be utilised in the event of a fire. Existing fire equipment is regularly serviced and maintained.
	Contaminated firewater and stormwater	Overland flow, subsurface seepage	<ul style="list-style-type: none"> Stormwater is diverted away from waste storage areas. Contaminated fire water will be diverted and contained in the surface water management system. It will then be transferred to the onsite liquid waste ponds for disposal via evaporation.
Storage of tyres	Unauthorised fires – smoke and fire spread	Air/windborne	<ul style="list-style-type: none"> Management controls have been implemented to reduce the historical stockpiling of tyres at the premises. Ongoing storage of tyres will be limited to no more than 720 tyres at any one

Sources	Emission	Potential pathways	Proposed controls
			<p>time at the premises.</p> <ul style="list-style-type: none"> • Tyres will be stored within three hook bins. • The hook bins will be free of leaks, to prevent the discharge of contaminated stormwater or, in the event of a fire, fire water. • Contaminated fire water will be contained within the hook bins and transferred to the onsite liquid waste ponds for disposal via evaporation.
	Contaminated firewater and stormwater	Overland flow, subsurface seepage	<ul style="list-style-type: none"> • Stormwater is diverted away from waste storage areas. • Contaminated fire water will be diverted and contained in the surface water management system. It will then be transferred to the onsite liquid waste ponds for disposal via evaporation.
Shredding of tyres	Noise	Air/windborne	<ul style="list-style-type: none"> • Premises siting. • Equipment use will be limited to operational hours only. • Equipment and machinery to be maintained in good working order.
	Dust	Air/windborne	<ul style="list-style-type: none"> • Tyres to be wetted down prior to shredding if needed and disposed of to the Inert Waste landfill cell immediately after shredding. • Cease shredding during strong winds.
	Unauthorised fires – smoke and fire spread	Air/windborne	<ul style="list-style-type: none"> • Tyre shred to be disposed of to the Inert Waste landfill cell immediately after shredding and covered. • Existing fire suppression equipment to be utilised in the event of a fire. • Existing fire equipment is regularly serviced and maintained.
	Contaminated firewater and stormwater	Overland flow, subsurface seepage	<ul style="list-style-type: none"> • Stormwater is diverted away from waste storage areas. • Contaminated fire water will be diverted and contained in the surface water management system. It will then be transferred to the onsite liquid waste ponds for disposal via evaporation.

3.1.2 Receptors

In accordance with the *Guideline: Risk assessments* (DWER 2020), the delegated officer has excluded employees, visitors and contractors from its assessment. Protection of these parties often involves different exposure risks and prevention strategies and is provided for under other state legislation.

Potential human and environmental receptors that may be impacted as a result of activities upon, or emissions and discharges from the prescribed premises are identified in Table 3 and Figure 1, in accordance with the *Guideline: Environmental siting* (DWER 2020).

Table 3: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from prescribed activity
Residential subdivisions	<ul style="list-style-type: none"> Baynton West subdivision 2.9 km northeast of the premises boundary
Accommodation villages	<ul style="list-style-type: none"> Stayover Karratha 1.3 km south-east of the premises boundary Red Dog Village 1.7 km north-east of the premises boundary Civeo Karratha Village 2.3 km north-east of the premises boundary
Schools	<ul style="list-style-type: none"> Baynton West Primary School & Baynton West Park 3.4 km northwest of the premises boundary
Environmental receptors	Distance from prescribed activity
Threatened and priority ecological communities ¹	<ul style="list-style-type: none"> One Priority 1 ecological community is located 300 m west of the premises boundary One Priority 1 ecological community is located 1.3 km southeast of the premises boundary
Threatened and priority flora ¹	<ul style="list-style-type: none"> One Priority 3 flora species located 8.1 km east of the premises boundary One Priority 3 flora species located 9.1 km southeast of the premises boundary
Threatened and priority fauna ¹	<ul style="list-style-type: none"> 26 bird species ranging from critically endangered, vulnerable, priority 4 and migratory within a 2 km radius of the premises boundary 9 endangered mammal species within a 2 km radius of the premises boundary
Native vegetation	<ul style="list-style-type: none"> Immediately surrounding the premises boundary to the east and south. Dampier-Paraburdoo railway is to the west, with native vegetation beyond.
<i>Rights in Water and Irrigation Act 1914</i> (RIWI Act) – Surface Water Areas and Irrigation Districts	<ul style="list-style-type: none"> Premises located within the Pilbara Surface Water Area.

<i>Rights in Water and Irrigation Act 1914 (RIWI Act) - Groundwater Areas</i>	<ul style="list-style-type: none"> • Premises located within the Pilbara Groundwater Area.
Underlying groundwater (non-potable purposes) ²	<ul style="list-style-type: none"> • Groundwater typically 6-10m below existing ground level. • Hyper saline brackish.
Surface water tributaries, hydrography	<ul style="list-style-type: none"> • Non-perennial watercourse originates within the premises and exits to the east. • Non-perennial watercourse runs as close as 500 m to the east of the premises boundary, in a southern to a northern direction.
Cultural receptors	Distance from prescribed activity
Aboriginal heritage sites	<ul style="list-style-type: none"> • Karratha West Access RD 09 (ID 8915) consisting of artefacts and scatter is located adjacent to the premises, to the east. • Karratha West Access RD 10 (ID 8916) consisting of artefacts and scatter is located adjacent to the premises, to the east. • Karratha West 1 (ID 7509) consisting of artefacts and scatter is located 900 m to the east of the premises. • Karratha Western Bypass (Option 1) (ID 17086 and 17087) consisting of artefacts, scatter and a quarry is located 1 km to the east of the premises.

Note 1: Data obtained from the Department of Biodiversity, Conservation and Attractions database search on 23/02/2026.

Note 2: Groundwater information is derived from licence holder commissioned studies and groundwater monitoring previously provided to the department.

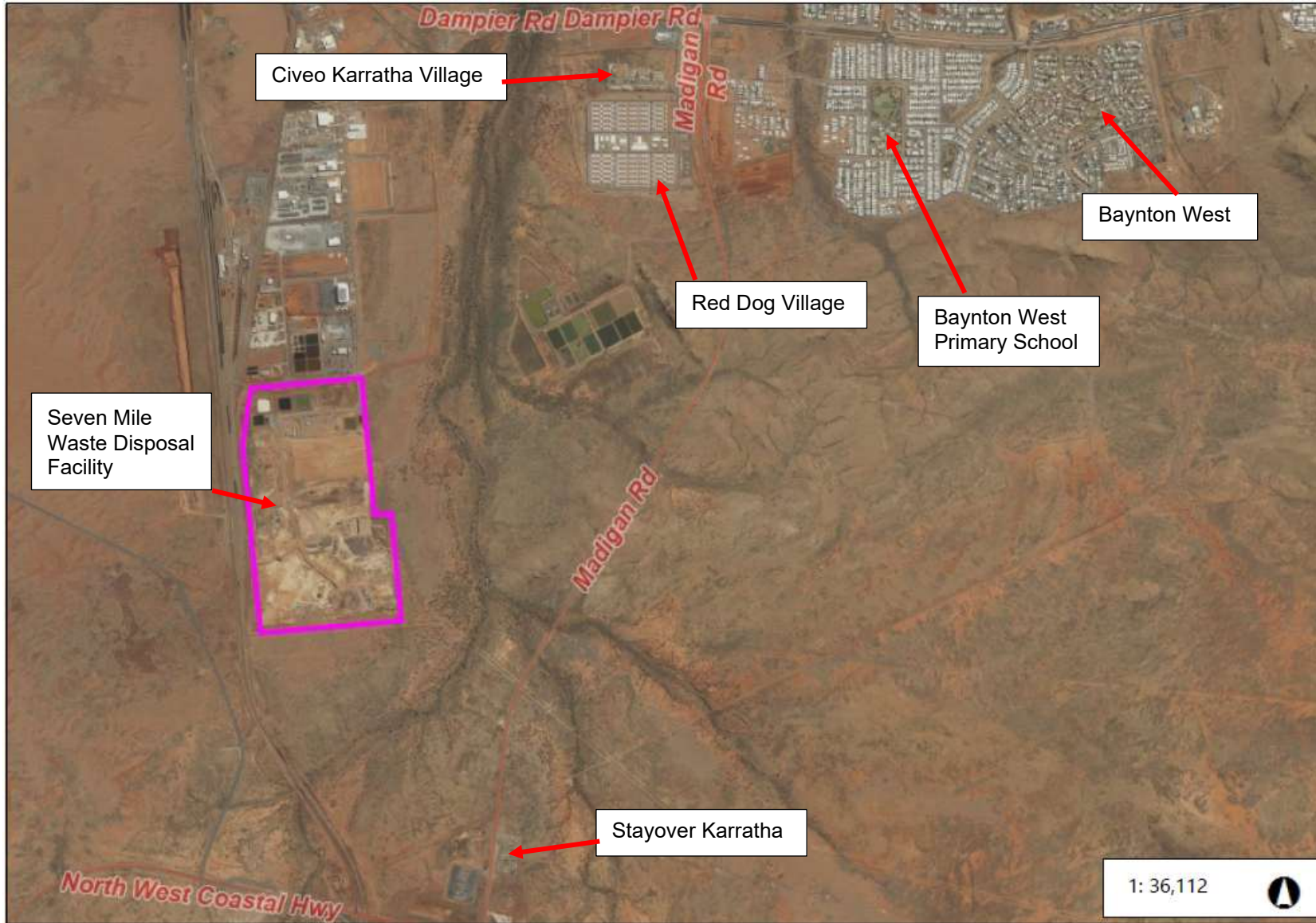


Figure 1: Distance to sensitive receptors

Licence: [L7021/1997/15](#)

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for those emission sources which are proposed to change and considers potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages are in-complete they have not been considered further in the risk assessment.

Where the licence holder has proposed mitigation measures/controls (as detailed in Section 3.1), these have been considered when determining the final risk rating. Where the delegated officer considers the licence holder's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the licence as regulatory controls.

Additional regulatory controls may be imposed where the licence holder's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 4.

The revised licence L7021/1997/15 that accompanies this amendment report authorises emissions associated with the operation of the premises.

The conditions in the revised licence have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

Table 4. Risk assessment of potential emissions and discharges from the premises during operation

Risk events					Risk rating ¹ C = consequence L = likelihood	Licence holder's controls sufficient?	Conditions ² of licence	Justification for regulatory controls
Sources / activities	Potential emissions	Potential pathways and impact	Receptors	Licence holder's controls				
Operation (including time-limited-operations operations)								
Shredding of green waste and wood waste	Noise	Pathway: Air/windborne Impact: Health and amenity	Residential premises, accommodation camps & schools	Refer to Section 3.1	C = Slight L = Unlikely Low Risk	Yes	None	The Delegated Officer considers the distance to sensitive residential receptors will mitigate impacts from noise emissions. Unreasonable emissions of noise will be regulated under the <i>Environmental Protection (Noise) Regulations 1997</i> .
	Leachate	Pathway: Subsurface seepage Impact: Groundwater quality	Groundwater sources	Refer to Section 3.1	C = Minor L = Unlikely Medium Risk	Yes	Conditions 6, 7, 8, 9, 12, 25, 27, 29, 36, 39, 40, 41, 42, 43, Conditions 20, 24, 26	The Delegated Officer considers the licence holder's commitment to reduce stockpile sizes by 30/06/2026 will mitigate the risk of leachate. The Delegated Officer will regulate this commitment with a specified due date in the licence. As this risk is mitigated by adequate implementation of these controls, the Delegated Officer shall enforce these controls via operational conditions on the licence. The Delegated Officer notes an additional licence condition is required for the maintenance of the Class III landfill cell to further mitigate emissions of leachate, therefore condition 20, Table 5 has been amended to incorporate this infrastructure. The Delegated Officer notes additional licence conditions were required to clarify the requirements around monitoring timeframes and maintenance of monitoring equipment, therefore condition 24 and condition 26 have been added to the licence.
	Unauthorised fires – smoke and fire spread	Pathway: Air/windborne Impact: Surrounding ecological communities, vegetation and fauna, aboriginal cultural heritage sites, residences	Residential premises, accommodation camps & schools Aboriginal cultural heritage sites Native and protected vegetation and fauna	Refer to Section 3.1	C = Major L = Possible High Risk	Yes	Conditions 6, 7, 8, 9, 12, 14, 16, 17, 18, 19, 39, 40, 41, 44 Condition 20	The Delegated Officer considers the licence holder's commitment to reduce stockpile sizes and implement a separation distance between and around stockpiles by 30/06/2026 will mitigate the risk of fires. The Delegated Officer will regulate this commitment by specifying a due date in the licence. As this risk is mitigated by adequate implementation of these controls, the

Risk events					Risk rating ¹ C = consequence L = likelihood	Licence holder's controls sufficient?	Conditions ² of licence	Justification for regulatory controls
Sources / activities	Potential emissions	Potential pathways and impact	Receptors	Licence holder's controls				
		and schools						Delegated Officer shall enforce these controls via operational conditions on the licence. The Delegated Officer notes an additional licence condition is required for the maintenance of the fire mitigation equipment and the Hammel shredder to further mitigate the risk of fires during shredding, therefore condition 20, Table 5 has been amended to incorporate this infrastructure.
Shredding of green waste and wood waste	Contaminated firewater and stormwater	Pathway: Overland flow, subsurface seepage Impact: Surface water quality, groundwater quality	Surface water bodies Groundwater sources	Refer to Section 3.1	C = Moderate L = Possible Medium Risk	Yes	Conditions 17, 18, 20, 21, 22, 23, 39	The Delegated Officer considers the controls proposed by the licence holder are sufficient to mitigate emissions of contaminated firewater and stormwater from shredding of green waste and wood waste in most circumstances. As this risk is mitigated by adequate implementation of these controls, the Delegated Officer shall enforce these controls via operational conditions on the licence.
	Product quality – mulch	Pathway: Discharge of contaminants to land through application of physical, chemical and/or biological contaminated products Impact: Direct contact of product by consumers and the receiving environment impacting amenity and environmental and human health	Product users Any receiving environment of the composted product	Refer to Section 3.1	C = Moderate L = Possible Medium Risk	Yes	Conditions 6, 7, 8, 28, 39, 42, 43 Condition 9	The licence holder advised that mulch produced on the premises consists of green waste only, but does not undergo solarisation or pasteurisation. Mulch is used only for municipal purposes; it is not available for use by the public. Mulch produced on the premises is classed as a Category B product as per the <i>Guideline: Better practice organics recycling</i> (DWER, 2022). It is the responsibility of the licence holder to ensure that products are fit-for-purpose for the proposed end use. A fit-for-purpose product provides beneficial uses for the environment when used and does not contain contaminants at a level that could cause pollution or environmental harm. Unsolarised, unpasteurised mulch is typically only fit-for-purpose in areas that are not weed sensitive or close to sensitive receptors. The Delegated Officer considers the

Risk events					Risk rating ¹ C = consequence L = likelihood	Licence holder's controls sufficient?	Conditions ² of licence	Justification for regulatory controls
Sources / activities	Potential emissions	Potential pathways and impact	Receptors	Licence holder's controls				
								controls proposed by the licence holder may cause residual low level impacts to the receiving environment from contaminated mulch. As such, the Delegated Officer has implemented additional operational controls in condition 9 for the processing of green waste to mitigate risks posed with the reuse of mulch products.
Shredding of mattresses	Noise	Pathway: Air/windborne Impact: Health and amenity	Residential premises, accommodation camps & schools	Refer to Section 3.1	C = Slight L = Unlikely Low Risk	Yes	None	The Delegated Officer considers the distance to sensitive residential receptors will mitigate impacts from noise emissions. Unreasonable emissions of noise will be regulated under the <i>Environmental Protection (Noise) Regulations 1997</i> .
Shredding of mattresses	Dust, particulates and windborne wastes	Pathway: Air/windborne Impact: Health and amenity, surface water quality	Surface water bodies	Refer to Section 3.1	C = Minor L = Possible Medium Risk	Yes	Conditions 9, 10, 11, 15	The Delegated Officer considers the controls proposed by the licence holder are sufficient to mitigate emissions of dust, particulates and windblown wastes from shredding of mattresses in most circumstances. As this risk is mitigated by adequate implementation of these controls, the Delegated Officer shall enforce these controls via operational conditions on the Licence.
	Leachate	Pathway: Subsurface seepage Impact: Groundwater quality	Groundwater sources	Refer to Section 3.1	C = Minor L = Unlikely Medium Risk	Yes	Conditions 6, 7, 8, 9, 12, 25, 27, 28, 35, 38, 39, 40, 41, 42, <u>Conditions 20, 24, 26</u>	The Delegated Officer considers the controls proposed by the licence holder are sufficient to mitigate emissions of leachate from shredding of mattresses in most circumstances. As this risk is mitigated by adequate implementation of these controls, the Delegated Officer shall enforce these controls via operational conditions on the licence. The Delegated Officer notes an additional licence condition is required for the maintenance of the Class III landfill cell to further mitigate emissions of leachate, therefore condition 20, Table 5 has been amended to incorporate this infrastructure.

Risk events					Risk rating ¹ C = consequence L = likelihood	Licence holder's controls sufficient?	Conditions ² of licence	Justification for regulatory controls
Sources / activities	Potential emissions	Potential pathways and impact	Receptors	Licence holder's controls				
								The Delegated Officer notes additional licence conditions were required to clarify the requirements around monitoring timeframes and maintenance of monitoring equipment, therefore condition 24 and condition 26 have been added to the licence.
	Unauthorised fires – smoke and fire spread	Pathway: Air/windborne Impact: Surrounding ecological communities, vegetation and fauna, aboriginal cultural heritage sites, residences and schools	Residential premises & schools Aboriginal cultural heritage sites Native and protected vegetation and fauna	Refer to Section 3.1	C = Major L = Possible High Risk	Yes	Conditions 6, 7, 8, 9, 12, 14, 16, 17, 18, 19, 38, 39, 40, 43 Condition 20	The Delegated Officer considers the controls proposed by the licence holder are sufficient to mitigate fires in most circumstances. As this risk is mitigated by adequate implementation of these controls, the Delegated Officer shall enforce these controls via operational conditions on the licence. The Delegated Officer notes an additional licence condition is required for the maintenance of the fire mitigation equipment and the Hammel shredder to further mitigate the risk of fires during shredding, therefore condition 20, Table 5 has been amended to incorporate this infrastructure.
Shredding of mattresses	Contaminated firewater and stormwater	Pathway: Overland flow, subsurface seepage Impact: Surface water quality, groundwater quality	Surface water bodies Groundwater sources	Refer to Section 3.1	C = Moderate L = Possible Medium Risk	Yes	Conditions 17, 18, 20, 21, 22, 23, 38	The Delegated Officer considers the controls proposed by the licence holder are sufficient to mitigate emissions of contaminated firewater and stormwater from shredding of mattresses in most circumstances. As this risk is mitigated by adequate implementation of these controls, the Delegated Officer shall enforce these controls via operational conditions on the licence.
Storage of tyres	Unauthorised fires – smoke and fire spread	Pathway: Air/windborne Impact: Surrounding ecological communities, vegetation and	Residential premises & schools Aboriginal cultural heritage sites Native and protected vegetation and fauna	Refer to Section 3.1	C = Major L = Possible High Risk	Yes	Conditions 6, 7, 8, 9, 12, 14, 16, 17, 18, 19, 38, 39, 40, 43 Condition 20	The Delegated Officer considers the licence holder's achievement of reducing tyre stockpile sizes, combined with the ongoing reduction in on-site storage of tyres, landfilling of shred and use of fire suppression equipment will significantly mitigate fire risk at the premises.

Risk events					Risk rating ¹ C = consequence L = likelihood	Licence holder's controls sufficient?	Conditions ² of licence	Justification for regulatory controls
Sources / activities	Potential emissions	Potential pathways and impact	Receptors	Licence holder's controls				
		fauna, aboriginal cultural heritage sites, residences and schools						As this risk is mitigated by adequate implementation of these controls, the Delegated Officer shall enforce these controls via operational conditions on the licence. The Delegated Officer notes an additional licence condition was required for the maintenance of the fire mitigation equipment and the hook bin area, therefore condition 20, Table 5 has been amended to incorporate this infrastructure.
	Contaminated firewater and stormwater	Pathway: Overland flow, subsurface seepage Impact: Surface water quality, groundwater quality	Surface water bodies Groundwater sources	Refer to Section 3.1	C = Moderate L = Possible Medium Risk	Yes	Conditions 17, 18, 20, 21, 22, 23, 38 Condition 20	The Delegated Officer considers the controls proposed by the licence holder are sufficient to mitigate emissions of contaminated firewater and stormwater from the storage of tyres in most circumstances. As this risk is mitigated by adequate implementation of these controls, the Delegated Officer shall enforce these controls via operational conditions on the licence. The Delegated Officer notes an additional licence condition was required for the maintenance of the hook bins, therefore condition 20, Table 5 has been amended to incorporate this infrastructure.
Shredding of tyres	Noise	Pathway: Air/windborne Impact: Health and amenity	Residential premises, accommodation camps & schools	Refer to Section 3.1	C = Slight L = Unlikely Low Risk	Yes	None	The Delegated Officer considers the distance to sensitive residential receptors will mitigate impacts from noise emissions. Unreasonable emissions of noise will be regulated under the Environmental Protection (Noise) Regulations 1997.
Shredding of tyres	Dust	Pathway: Air/windborne Impact: Health and amenity, surface water quality	Surface water bodies	Refer to Section 3.1	C = Minor L = Unlikely Medium Risk	Yes	Conditions 10, 11	The Delegated Officer considers the controls proposed by the licence holder are sufficient to mitigate emissions of dust from shredding of tyres in most circumstances. As this risk is mitigated by adequate implementation of these controls, the Delegated Officer shall enforce these controls via operational conditions on the Licence.

Risk events					Risk rating ¹ C = consequence L = likelihood	Licence holder's controls sufficient?	Conditions ² of licence	Justification for regulatory controls
Sources / activities	Potential emissions	Potential pathways and impact	Receptors	Licence holder's controls				
	Unauthorised fires – smoke and fire spread	<p>Pathway: Air/windborne</p> <p>Impact: Surrounding ecological communities, vegetation and fauna, aboriginal cultural heritage sites, residences and schools</p>	<p>Residential premises & schools</p> <p>Aboriginal cultural heritage sites</p> <p>Native and protected vegetation and fauna</p>	Refer to Section 3.1	<p>C = Major</p> <p>L = Possible</p> <p>High Risk</p>	Yes	<p>Conditions 6, 7, 8, 9, 14, 16, 17, 18, 19, 38, 39, 40, 43</p> <p><u>Condition 12, 20</u></p>	<p>The Delegated Officer considers the licence holder's commitment to ongoing landfilling of shred and use of fire suppression equipment will significantly mitigate the risk of fire at the premises.</p> <p>As this risk is mitigated by adequate implementation of these controls, the Delegated Officer shall enforce these controls via operational conditions on the licence.</p> <p>The Delegated Officer notes an additional licence condition is required for the maintenance of the fire mitigation equipment and the Hammel shredder to further mitigate the risk of fires during shredding, therefore condition 20, Table 5 has been amended to incorporate this infrastructure. Further, the cover requirements for tyres does not include a final soil cover, therefore condition 12, Table 4 has been amended to include 500 mm cover depth each month.</p>
	Contaminated firewater and stormwater	<p>Pathway: Overland flow, subsurface seepage</p> <p>Impact: Surface water quality, groundwater quality</p>	<p>Surface water bodies</p> <p>Groundwater sources</p>	Refer to Section 3.1	<p>C = Moderate</p> <p>L = Possible</p> <p>Medium Risk</p>	Yes	<p>Conditions 17, 18, 20, 21, 22, 23, 38</p>	<p>The Delegated Officer considers the controls proposed by the licence holder are sufficient to mitigate emissions of contaminated firewater and stormwater from the shredding of tyres in most circumstances.</p> <p>As this risk is mitigated by adequate implementation of these controls, the Delegated Officer shall enforce these controls via operational conditions on the licence.</p>

Note 1: Consequence ratings, likelihood ratings and risk descriptions are detailed in the *Guideline: Risk assessments* (DWER 2020).

Note 2: Proposed licence holder's controls are depicted by standard text. **Bold and underline text** depicts additional regulatory controls imposed by the delegated officer.

4. Assessment of licence holder's request to amend conditions

4.1 Removal of Category 67A composting activities

The Delegated Officer has determined that the removal of Category 67A from licence L7021/1997/15 will not require ongoing environmental risks requiring regulation under Part V of the EP Act. As the prescribed activities associated with Category 67A are no longer occurring, the Delegated Officer will amend the licence to remove this category and associated conditions.

4.2 Quarantine zone for contaminated solid wastes

The licence holder ensures contaminated solid waste is tested prior to being accepted at the premises, to determine initial compliance with Class III requirements of the *Landfill Waste Classification and Waste Definitions 1996* (DWER, 2019), which complies with condition 6 of the licence.

The storage of contaminated solid waste that meets Class III requirements atop the current active Class III landfill cell while awaiting secondary testing, complies with the requirements of condition 8 for it be stored in a quarantined area.

The delegated officer has determined that the quarantine activities comply with current licence conditions, therefore do not require further assessment nor regulatory control.

5. Review of landfill gas management plan

When preparing the Landfill Closure Plan for the premises, the licence holder undertook a landfill gas modelling exercise using GasSim to estimate the production of landfill gas over the premises' lifetime. The results of this modelling showed that, at the time of capping Cell 0, landfill gas production would be on the cusp of being suitable for active management, and onsite verification of gas production rates would be required to determine if an active or passive system would be most appropriate.

A one-year trial period was proposed to follow the capping works, during which time landfill gas rates at the premises would be measured to establish if a passive or active system would be the most suitable management option. As such, the licence amendment of 28 August 2020 provided for the installation of a passive system for the initial management of landfill gas for a long-term decision to be determined following the trial period.

However, during the capping works an active landfill gas system was installed and connected to a temporary flare, which has subsequently been in operation since 2 February 2023, with the flare's performance proposed to be assessed by the licence holder at the end of the trial to determine if its use should be continued for landfill gas management, or if the wells should be converted to a passive system until the next phase of capping works occurs. This was formalised by way of a licence amendment adding a condition to require the lodgement of a landfill gas management plan by 30 June 2024 detailing the outcome of the trial.

The licence holder lodged the Landfill Gas Management Plan (Talis Consultants, 2024) on 28 June 2024. The report states the flaring trial period has shown there is adequate gas production within Cell 0 to continue management of landfill gas using an active management system, and that the current flare is suitably sized for continued use.

The key recommendations of the plan include:

- Some wells in the north east of Cell 0 require investigation to ensure they are not broken or allowing air intrusion.

- Carbon monoxide is elevated on the northern boundary, indicating greater consideration for gas control might be required when adjusting the wellfield, however the current status is to continue to analyse gas production.
- Review the adequacy of gas protection measures for onsite buildings.
- The landfill gas flare, gas extraction wells and perimeter monitoring wells are to be monitored on an ongoing basis, with the application of trigger level exceedances and reporting of remedial actions.

Key Finding: The Delegated Officer has reviewed the recommendations of the Landfill Gas Management Plan and determined additional regulatory controls are required for the ongoing operation of the gas extraction system including:

- 1) Modification of condition 20, Table 5 to include maintaining and operating the landfill gas extraction system adequately.
- 2) Modification of condition 31, Table 9 to require monitoring of extraction well emissions and perimeter well emissions.
- 3) Addition of condition 32, Table 10 to implement trigger levels for the detection of failures in the gas extraction system.
- 4) Addition of condition 33 where, within 14 days of a parameter exceeding the trigger level, the landfill cover integrity is to be checked, monitoring points are to be resampled, and the las well flow rate is adjusted if required.
- 5) Addition of condition 34 where, within 14 days of any action being taken under condition 33, a report is to be lodged detailing the parameters exceeded, the cause of the exceedance and actions taken to mitigate a recurrence of the exceedance.
- 6) Modification of condition 43, Table 14 to require the reporting of exceedances of trigger levels within 72 hours of the exceedance.

The Delegated Officer notes the Landfill Gas Management Plan did not include a trigger value for the gas temperature of the extraction wells, therefore has applied a trigger of > 60°C in accordance with the *Best Practice Environmental Management: Siting, design, operation and rehabilitation of landfills* (EPA Victoria, 2015).

The Delegated Officer notes that following lodgement of the Landfill Gas Management Plan, condition 38 and condition 39 are redundant and therefore will be deleted.

6. Consultation

Table 5 provides a summary of the consultation undertaken by the delegated officer.

Table 5: Consultation

Consultation method	Comments received	Delegated officer's response
Licence holder was provided with draft documents on 21/04/2026.	See Appendix 1	See Appendix 1

7. Conclusion

Based on the assessment in this amendment report, the delegated officer has determined that a revised licence L7021/1997/15 will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

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7.1 Summary of amendments

Table 6 provides a summary of the proposed amendments and will act as a record of implemented changes. All proposed changes have been incorporated into the revised licence as part of the amendment process.

Table 6: Summary of licence amendments

Condition	Previous condition	Amendments
Front page	Front page	Category 57 amended to 240 tyres at any one time. Category 61A amended to 12,000 tonnes per annual period. Category 67A deleted.
Condition 2 Table 1	Condition 2 Table 1	Proposed landfill cells 1 – 12 itemised to reflect the staged construction approach and for clarity when reporting against condition 4.
Condition 5	Condition 5	Reference to numbering within condition updated.
Condition 6 Table 2	Condition 6 Table 2	New Category column added to Table 2 for clarity. Waste Code column deleted from Table 2. New column added to Table 2 for clarity to specify the previously approved rates of waste acceptance for Category 62, Category 57 and Category 61A waste. Household Hazardous Waste reference to Schedule number corrected within acceptance specification. Row for empty drums relevant to DrumMuster collection under Category 62 moved from condition 9 Table 3. Row for Inert Waste Type 2 (Tyres) expanded to clarify Category 57 and Category 61A waste acceptance. Row for mattresses added with an acceptance specification being for shredding prior to recycling of steel and disposal by landfilling. Row for green waste intended for reuse added with an acceptance specification being for shredding prior to off-site reuse. Row for untreated wood waste intended for reuse added with an acceptance specification being for shredding prior to off-site reuse, and limitations to the type of wood waste that can be accepted. Row for putrescible wastes amended to remove green wastes. Row for green waste intended for disposal added with an acceptance specification being for burning or landfilling, and includes contaminated green waste. Row for contaminated solid wastes modified to: <ul style="list-style-type: none"> Delete acids in solid form, lead acid batteries, aerosol cans, as this is adequately covered as a hazardous household waste in row 1 and as listed in Schedule 3;

Condition	Previous condition	Amendments
		<ul style="list-style-type: none"> • Move empty drums to its own row; • Delete quarantine waste as it is not contaminated solid waste but rather Special Waste Type 2; • Delete drill mud as it does not require specifying, since all contaminated solid waste can be accepted at the premises if it meets the acceptance requirements of Class III landfills, and add an acceptance specification that the drill mud must be in a spadeable state prior to acceptance at the premises for clarification. • Add an acceptance specification for contaminated green waste and wood waste accepted from the Karratha Waste Handling Facility operated by Cleanaway Pty Ltd under licence L8848/2014/1. <p>Row for molecular sieve waste moved into contaminated solid waste with the leachable concentration being noted as an acceptance specification.</p> <p>Row for Special Waste Type 2 amended to include an acceptance specification that includes quarantine waste.</p> <p>Row for Special Waste Type 3 reference to Schedule number corrected within acceptance specification.</p> <p>Rows for food organics and garden organics deleted as requested by applicant.</p>
<p>Condition 9 Table 3</p>	<p>Condition 9 Table 3</p>	<p>New Category column added to Table 3 for clarity.</p> <p>Household Hazardous Waste process limit for lead acid batteries moved into this row from individual row.</p> <p>Row for All wastes modified for clarity within the process to add 'receipt, handling and storage prior to' for disposal by landfilling.</p> <p>Row for Clean fill modified for clarity within the process to add 'and storage prior to' for disposal to landfilling.</p> <p>Row for Inert Waste Type 1 modified for clarity by:</p> <ul style="list-style-type: none"> • Process amended to add 'and storage prior to' for disposal to landfilling. • Addition of limits preventing crushing and screening. <p>Row for Contaminated Solid Wastes modified to remove specified waste types and process limits, as they are now specified in condition 6 Table 2, and add 'none specified' to the process limit.</p> <p>Row for Molecular Sieve Waste deleted as it has moved to condition 6 Table 2.</p> <p>Row for Quarantine Waste deleted as these wastes are included as Special Waste Type 2 and adequately covered by that row.</p>

Condition	Previous condition	Amendments
		<p>Row for Lead Acid Batteries deleted and the process limit moved into the row for Household Hazardous Waste.</p> <p>Row for Inert Waste Type 2 modified for clarity by:</p> <ul style="list-style-type: none"> • New row added for Category 57 with the process limit amended to 720 tyres to be stored at any one time, within three hook bins and bins to be located away from combustible waste. • New row added for Category 61A with the process added for 'shredding', and a process limit being only whole, unburnt tyres are to be shredded. • Existing row for Category 64 amended to include process limits that tyres which are burnt or otherwise damaged are to be landfilled, and once shredded, tyre shred is to be landfilled within the Inert Waste Cell by the end of that working day. <p>Row for green waste for disposal expanded for clarity with a process added for 'receipt, handling and storage prior to burning or landfilling', and process limits added that green waste is free of any physical or chemical contaminants and that green waste that does not meet the process limits is to be landfilled.</p> <p>Row for untreated wood waste and green waste for reuse added, with a process of 'receipt, handling, storage and shredding prior to off-site reuse', and process limits added to prevent shredding of waste containing absorbed chemical wastes, with separation distances to the boundary and stockpile sizes for unshredded and shredded wood commencing on 30/06/2026, dust suppression, and mulch requirements.</p> <p>Row for mattresses added with:</p> <ul style="list-style-type: none"> • New line for Category 61A processes of 'receipt, handling, storage and shredding', and process limits for the number of mattresses stored at any one time, stockpile sizes, storage time, and dust suppression. • New line for Category 64 processes of 'disposal by landfilling', and process limits that mattress shred is to be disposed of within the Class III landfill cell by the end of that working day. <p>Special Waste Type 2 process limit modified for clarity to include biomedical and quarantine wastes and that works must not excavate or uncover Special Waste Type 2.</p> <p>Rows for food organics, garden organics and biosolids from on-site pond desludging falling under Category 67A deleted as requested by applicant.</p>
Condition 12 Table 4	Condition 12 Table 4	Row 1 modified to include a timescales for covering of Inert Waste Type 2 on a monthly basis.

Condition	Previous condition	Amendments
		Row 2 modified to delete 'molecular sieve waste' and add 'contaminated solid wastes' for clarity.
N/A	Condition 20	Redundant conditions due to reduction in tyre stockpiles. Conditions deleted. Tyre storage is adequately regulated by condition 9 Table 3.
N/A	Condition 21	
N/A	Condition 22	
N/A	Condition 23	
Condition 20 Table 5	Condition 24 Table 5	Condition modified for clarity to specify all infrastructure at the premises. Row 1 added to include requirements for Class III cell. Row 2 added to include requirements for Inert cell. Row 10 added to include requirements for the landfill gas management system. Row 11 added to include requirements for the Hammel shredder. Row 12 added to include requirements for the hook bins. Row 13 added to include requirements for the fire mitigation equipment.
Condition 24	N/A	Addition of new condition to specify the requirements for monthly, quarterly and annual monitoring.
Condition 25	Condition 29 Condition 30 Schedule 2	Redundant conditions, updated to current licensing format.
Condition 26	N/A	Addition of new condition to require monitoring equipment is operated and calibrated in accordance with the manufacturer's specifications.
Condition 27 Table 6	Condition 31 Table 6	Table 7 modified for clarity to simplify contaminated solid wastes, delete molecular sieve waste as it falls under contaminated solid wastes, and delete food organics and garden organics. Condition 32 Table 7 incorporated into Table 6 for clarity. The reporting on the quantity of mulch product is transferred from condition 33, Table 8.
N/A	Condition 33 Table 8	Condition deleted as composting activities have ceased. Condition 33 Table 8 product export information for mulch moved to condition 27 Table 6.
Condition 31 Table 9	Condition 37 Table 11	Table 9 modified to add the monitoring of landfill gas extraction wells and perimeter wells in accordance with the Landfill Gas Management Plan.

Condition	Previous condition	Amendments
N/A	Condition 38	The Landfill Gas Management Plan was lodged on 30 June 2024. As the requirements of this condition have been met, this condition is redundant and therefore deleted.
N/A	Condition 39	The Landfill Gas Management Plan lodged on 30 June 2024 included the information required by condition 39. As the requirements of this condition have been met, this condition is redundant and therefore deleted.
Condition 32 Table 10	N/A	Conditions added to incorporate the requirements of the Landfill Gas Management Plan including trigger levels, control actions when a trigger level is exceeded, and notification to the department.
Condition 33	N/A	
Condition 34	N/A	
N/A	Condition 40 Table 12	Conditions deleted as composting activities have ceased.
N/A	Condition 41	
N/A	Condition 42	
N/A	Condition 43	
N/A	Condition 44 Table 13 Table 14 Table 15	
Condition 35 Table 12	Condition 28 Schedule 2 Table 19	Schedule 2 and Table 19 moved to condition 35 Table 12. Frequency requirements for quarterly monitoring moved to condition 24.
Condition 37	Condition 48	Condition modified for clarity regarding Special Waste Type 2 which includes biomedical, clinical and quarantine wastes.
Condition 38	N/A	Condition added as a new format template condition requiring the maintaining of books.
Condition 40	Condition 46	Condition modified for clarity to specify the due date for the AACR.
Condition 41 Table 13	Condition 49 Table 16	Condition modified for clarity to specify the due date of 1 April for the environmental report. Table 13 updated to correct condition references, delete composting reporting and modify landfill gas reporting.

Condition	Previous condition	Amendments
Condition 43 Table 14	Condition 51 Table 17	Table 14 modified to correct condition references and add notification requirements for the exceedance of landfill gas trigger levels.
Definitions Table 15	Definitions Table 18	Addition of new format definitions: ACN, approved form and licence. Deletion of redundant definitions: AACR, compliance report, department request, environmental harm, GRI GM 17, implementation agreement or decision, material environmental harm, primary activities, serious environmental harm and unreasonable emission.
Figure 1	Figure 1	Figure updated and replaced.
Figure 2	N/A	New figure added depicting the premises infrastructure layout.
Figure 3	Figure 2	Figure updated and replaced.
N/A	Figure 3	Figure redundant so deleted.
Figure 4	Figure 4	Figure retained.
N/A	Figure 5	Figure deleted as composting activities have ceased.
N/A	Figure 6	Figure deleted as composting activities have ceased.
Figure 5	Figure 7	Figure updated and bore references included.
N/A	Schedule 2 Table 19	Schedule 2 and Table 19 moved to condition 37 and Table 14.
Schedule 2 Table 16	Schedule 3 Table 20	Schedule retained.
Schedule 3 Table 17	Schedule 4	Schedule retained.

References

1. Department of Environment Regulation (DER) (2015) *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. Department of Water and Environmental Regulation (DWER) (2020) *Guideline: Environmental Siting*, Perth, Western Australia.
3. DWER (2020) *Guideline: Risk Assessments*, Perth, Western Australia.
4. DWER (2022) *Guideline: Better practice organics recycling*, Perth, Western Australia.
5. Talis Consultants (2024) *Landfill Gas Management Plan: Seven Mile Waste Facility*.

Appendix 1: Summary of licence holder's comments on draft amendment

Condition or section	Summary of licence holder's comment	Delegated Officer's response
Licence		
Cover page Category 57 assessed design capacity	<p>The draft licence currently specifies 240 tyres at any one time.</p> <p>As per our original request, this was intended to reflect three (3) hook bins at approximately 240 tyres per bin (~720 tyres total).</p> <p>The current wording does not reflect this intent and would restrict operations to a single bin.</p> <p>Could this please be amended to align with 3 hook bins (approx. 720 tyres at any one time)</p>	<p>The applicant was asked to clarify the quantity of tyres required for storage in a request for further information during the assessment process. The response received on 13 February 2026 provided detail for the quantity of tyres able to be stored within one hook bin, therefore it was assumed one hook bin was required.</p> <p>The request to increase storage to 720 tyres, being stored within three hook bins does not modify the risk profile.</p> <p>The Delegated Officer has amended the assessed design capacity to be 720 tyres at any one time.</p>
Condition 6 Table 2	<p>Inert Waste Type 2 (Tyres)</p> <p>To be updated in line with the above amendment.</p>	<p>As above.</p> <p>The Delegated Officer has amended condition 6 Table 2 to read 720 tyres at any one time.</p>
	<p>Special Waste Type / Liquid Waste</p> <p>We note that the waste codes have been removed. Can you please provide some clarification for this change?</p>	<p>The EP Act, EP Regs and the guideline <i>Landfill Waste Classification and Waste Definitions 1996</i> (DWER, 2019) regulate the acceptance of wastes at a landfill premises.</p> <p>The Environmental Protection (Controlled Waste) Regulations 2004 categorises wastes into 15 broad waste groups which are used for the purposes of tracking the transportation of these waste groups.</p> <p>The waste codes do not provide authorisation of the types of waste able to be accepted at the premises, therefore they have been removed from condition 6 Table 2.</p>
Condition 9 Table 3	<p>Inert Waste Type 2 (Tyres)</p> <p>To be updated in line with the above amendment.</p>	<p>As above.</p> <p>The Delegated Officer has amended condition 6 Table 2 to read 720 tyres at any one time, stored within three hook bins.</p>

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Condition or section	Summary of licence holder's comment	Delegated Officer's response
	Point C under Category 61A Shredding appears incomplete and requires correction.	Typographical error. Corrected to read "Cease shredding during strong winds".
Condition 20 Table 5	Item 12 Please clarify what is meant by "skip bin" and whether this refers to hook bins associated with tyre storage.	Typographical error. Corrected to hook bins. The intention is that the hook bins are for tyre storage.
Condition 31 Table 9	Landfill Gas Flare The averaging period is listed as a "spot sample", for clarification, this data is electronically generated via the flare system, and no physical sample is taken	The phrase 'spot sample' is incorrectly applied to the scenario of continuous monitoring for landfill gas, therefore that reference has been deleted from row 1 within Table 9.
Condition 26	Condition 26 references "Condition 0" – please clarify.	Typographical error. Reference to condition 0 is not required so has been deleted.
Condition 27	Condition 27 appears to contain referencing error.	Typographical error. Corrected to refer to Table 6.
Condition 41 Table 13	The reference to condition 27 within Table 13 appears to contain referencing error.	Typographical error. Corrected to refer to Table 6.
Figure 2	New infrastructure layout map provided	Figure 2 updated with new map.
Amendment report		
Section 2.2.3	N/A	For consistency, section 2.2.3 has been updated to reflect the increased storage to 720 tyres, being stored within three hook bins.
Section 3.1.1 Table 2	N/A	For consistency, section 3.1.1 has been updated to reflect the increased storage to 720 tyres, being stored within three hook bins.
Section 3.2	N/A	For consistency, the reference to skip bin is changed to hook bins.
Section 7.1 Table 6	N/A	For consistency row detailing changes to condition 9 Table 3 modified to reflect updated changes applicable to this table. For consistency row detailing changes to condition 20 Table 5 modified to reflect updated changes applicable to this table.

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