Government of Western Australia
Department of Water and Environmental Regulation

Amendment Report

Application for Licence Amendment

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

Licence Number	L8889/2015/2
Licence Holder	Eastern Metropolitan Regional Council
File Number	APP-0032497
Premises	Red Hill Waste Management Facility Toodyay Road, RED HILL Legal description – Lot 1 on Diagram 15239, Lot 2 on Diagram 68630, Lots 8, 9, 10 on Deposited Plan 10872, Lot 11 on Diagram 69105 and Lot 12 on Deposited Plan 26468 As defined by the Premises map attached to the Revised Licence
Date of Report	17 April 2026
Decision	Revised licence granted

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1. Decision summary

Licence L8889/2015/2 is held by Eastern Metropolitan Regional Council (Licence Holder) for the Red Hill Waste Management Facility (the Premises), located on Toodyay Road, Red Hill.

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 construction and operation of infrastructure at the Premises. As a result of this assessment, Revised Licence L8889/2015/2 has been granted.

The Revised Licence issued as a result of this amendment consolidates and supersedes the existing Licence previously granted in relation to the Premises.

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 Application summary

On 18 November 2025, the Licence Holder submitted an application to the department to amend Licence L8889/2015/2 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act).

The application is to increase the Category 64 assessed production/design capacity from 350,000 tonnes to 550,000 tonnes per annum. The potential increase is due to other landfill facilities within the Perth Metropolitan Area either reaching capacity or seeking local alternatives, with the premises seeking to accommodate these additional municipal waste streams.

A premises boundary extension to include Lots 8, 9, 10 on Deposited Plan 10872 has also been applied for, consistent with works approval W2987/2025/1, issued on 5 September 2025, and Ministerial Statement MS 274.

The licence holder has also requested that the Category 67A FOGO composting activity be amended to include an improved processing operation. In assessing changes to the FOGO composting activities onsite, the Delegated Officer had regard for the determination and findings of Appeal 10-25 which was determined by the Minister for Environment on 18 November 2025.

This amendment is limited only to changes to Category 64 and 67A activities from the Existing Licence. No changes to the aspects of the existing Licence relating to Categories 12, 61A, 62 and 65 have been requested by the Licence Holder.

Table 1 below outlines the proposed changes to the existing Licence.

Table 1: Proposed throughput capacity changes

Category	Current throughput capacity	Proposed throughput capacity	Description of proposed amendment
64: Class II or III putrescible landfill site	350,000 tonnes per annual period	550,000 tonnes per annual period	Increased throughput to accommodate additional municipal waste streams

			from the surrounding local councils
67A: Compost manufacturing and soil blending	58,000 tonnes per annual period	No change	Modification of the FOGO processing activity.

2.3 Part IV of the EP Act

The premises is currently subject to six Ministerial Statements (MS) under Part IV of the EP Act. In regulating the premises under Part V, Division 3 of the EP Act, the department will seek to avoid duplication of requirements imposed under Part IV. Pursuant to section 54(4) of the EP Act, the department will also not perform any duty relating to the granting of a works approval that is contrary to, or otherwise than in accordance with, a Ministerial Statement.

A summary of the respective Ministerial Statements is provided below:

- MS 274 (15 July 1992) and MS 1140 (1 July 2020) – Relate to the Red Hill Waste Management Facility Extension;
- MS 462 (21 November 1997) – Relates to the establishment of Class IV waste disposal cells at the Red Hill Waste Management Facility; and
- MS 976 (9 July 2014), MS 1092 (5 March 2019) and MS 1122 (20 January 2020) – Relate to the proposal to construct and operate a resource recovery facility at the Red Hill Waste Management Facility, for the processing of waste to produce energy, using either anaerobic digestion or gasification technology.

MS 274 is the statement applicable to the application, relating to the construction, operation and post closure management of waste handling and landfilling aspects at the Red Hill Waste Management Facility.

On 8 July 2025, the EPA, acting as delegate for the Minister for Environment, gave approval pursuant to s. 45C (1) (a) of the EP Act to amend MS 274 for the inclusion of Part Lots 8, 9 and 10 into the authorised extent of development footprint.

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.

3.1 Source-pathways and receptors

3.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises operation which have been considered in this Amendment Report are detailed in Table 2 below, which also details the proposed control measures the Licence Holder has proposed to assist in controlling these emissions, where necessary.

Table 2: Licence Holder controls

Emission	Sources	Potential pathways	Proposed controls
Stormwater	Acceptance and burial of Category 64 wastes	Surface runoff and seepage to groundwater	- The site's surface water management system consisting of a network of stormwater drains directed to surface water attenuation ponds prior to discharge. - Diversion of water that does not come into contact with waste to surrounding areas. - All stormwater engineering features at the site will be inspected regularly and maintenance works scheduled appropriately. - Surface water monitoring as per licence.
Leachate	Acceptance and burial of Category 64 wastes	Surface runoff and seepage to groundwater	- The site has an extensive and interconnected leachate pond system to manage the leachate generated from all of the waste management activities taking place. - All waste handling operations will continue to be confined to their designated area. - Construction of a composite geosynthetic lining system for all currently active and any future landfill cells with a leachate collection and extraction that was been designed to best practice standards and undergone third-party construction quality assurance. - Utilisation of the site's landfill leachate evaporation pond system. - Groundwater monitoring as per licence.
Landfill Gas	Acceptance and burial of Category 64 wastes	Air/windborne pathway	- Installation of temporary/sacrificial active landfill gas collection and extraction system during filling operations. - Installation of permanent active landfill gas collection and extraction system following capping works. - Undertake fortnightly open air checks in up to nine (No. 9) designated locations with a MultiRAE PID, which records O_2, CO H_2S, LEL, VOC and NH_3. - Landfill gas monitoring and reporting as per the licence. - Landfill gas specialist contractor undertakes landfill gas composition monitoring, providing monthly and annual reporting. - Additional monitoring and management undertaken as part of power station operation.
Odour	Acceptance and burial of Category 64 wastes	Air/windborne pathway	- Installation of temporary/sacrificial and permanent active landfill gas management systems. - Undertake fortnightly open air checks in up to nine (No. 9) designated locations with a MultiRAE PID, which records O_2, CO H_2S, LEL, VOC and NH_3.

Emission	Sources	Potential pathways	Proposed controls
			- Consideration of meteorological conditions during material handling. - Regular maintenance and monitoring of the leachate treatment system. - Covering of waste during transport. - Daily cover and compaction of waste as per the licence. - Immediate burial of highly odorous wastes on acceptance at the weighbridge. - Working face is kept to maximum linear length of 50m as per licence. - Odour complaint system and follow-up investigations/actions.
Dust	Acceptance and burial of Category 64 wastes	Air/windborne pathway	- Vehicles to maintain minimum speed limits. - Use of a water cart as necessary. - Covering of waste during transport. - Appropriate handling and unloading of waste to minimise dust generation.
Noise	Acceptance and burial of Category 64 wastes	Air/windborne pathway	- Broadband reversing alarms fitted on mobile machinery. - Waste acceptance and the operation of equipment and machinery on site will continue to be restricted to operational hours only. - Vehicles to maintain minimum speed limits. - Noise reducing workplace procedures will be adopted such as slow unloading of materials from the lowest height possible. - All materials handling will continue to be confined to the designated areas. - All equipment and machinery will continue to be maintained in good working condition.
Asbestos	Acceptance and disposal of special waste type 1	Air/windborne pathway	- All asbestos and asbestos containing materials accepted at the Site are immediately buried in a dedicated asbestos disposal area as specified in the Licence. - Any asbestos contaminated C&D waste loads will be managed and when relevant will be buried within the asbestos disposal area as per the EMS's management procedures. - All personnel are trained in the appropriate inspection, handling and disposal of asbestos materials.
Windblown waste	Acceptance and disposal of Category 64 waste	*Air/windborne pathway*	- Maintenance of fencing 1.8m high. - Use of litter screens at the tipping face. - Working face is kept to maximum linear length of 50m as per Licence. - Daily compaction of waste.

Emission	Sources	Potential pathways	Proposed controls
			- Daily removal of windblown waste from fences and access roads.
Vermin and Feral Animals	Acceptance and burial of Category 64 wastes	Direct contact	- Daily covering and compaction of waste as stated within the licence and as per the Landfill Guidelines. - Feral animal will be managed as per EMS's feral animal management procedure. - Biannual pest control program completed by a licensed animal pest control contractor.
Fire	Smoke and fire wash water	Air/windborne pathway Surface runoff and seepage to groundwater	- Implementation of the Site's Emergency Preparedness and Response Plan. - Fire response infrastructure and equipment, including 30,000L mobile water cart. fire extinguishers, stormwater dams, and fire breaks. - Staff trained in fire response techniques. - The site's existing firefighting equipment will continue to be kept up to date and in working order.

3.1.2 Receptors

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

Table 3 below provides a summary of potential human and environmental receptors that may be impacted as a result of activities upon or emission and discharges from the prescribed premises *(Guideline: Environmental siting* (DWER 2020)).

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

Human receptors	Distance from prescribed activity
Residential premises	The closest single residence is more than 500m north from the nearest landfill operations and is separated by Toodyay Road. The closest subdivision is Barbarich Estate, which is located a minimum of 500m east of all Site operations. The closest residence to the south is approximately 530m from any Site operation.
Red Hill Auditorium concert hall	Approximately 1.4 km west of the premises boundary.
Environmental receptors	**Distance from prescribed activity**
John Forrest National Park	Immediately to the south of the premises boundary.
Class A Nature Reserve	Approximately 2600 m northwest of the premises boundary.

Object ID: 11879	
Threatened and Priority Flora	3 records of species with conservation status 4 within 3 km of the premises boundary.
Threatened fauna	28 records within 3 km of the premises boundary, including records within the premises boundary.
Priority 3 public drinking water source area	8.05km south
Christmas Tree Creek (minor watercourse) Susannah Brook (minor watercourse)	0.32km south 0.35km north-east
Groundwater	Regional groundwater is present in the basement saprolite or fractured basement, mostly semi-confined in pallid zone clays (5m to 15m thick, generally thicker in the western part of the Site) (MS Groundwater Management, 2016). The Site hydrogeology is comprised of temporary interflow water in the ferruginous zone above kaolinitic clays and a regional aquifer occurring in the saprolitic zone of granitic weathering that extends into fractures and jointing and along contacts with intrusions.
Cultural receptors	**Distance from prescribed activity**
Aboriginal cultural heritage - Register (DPLH-099)	Occurs over western portion of site

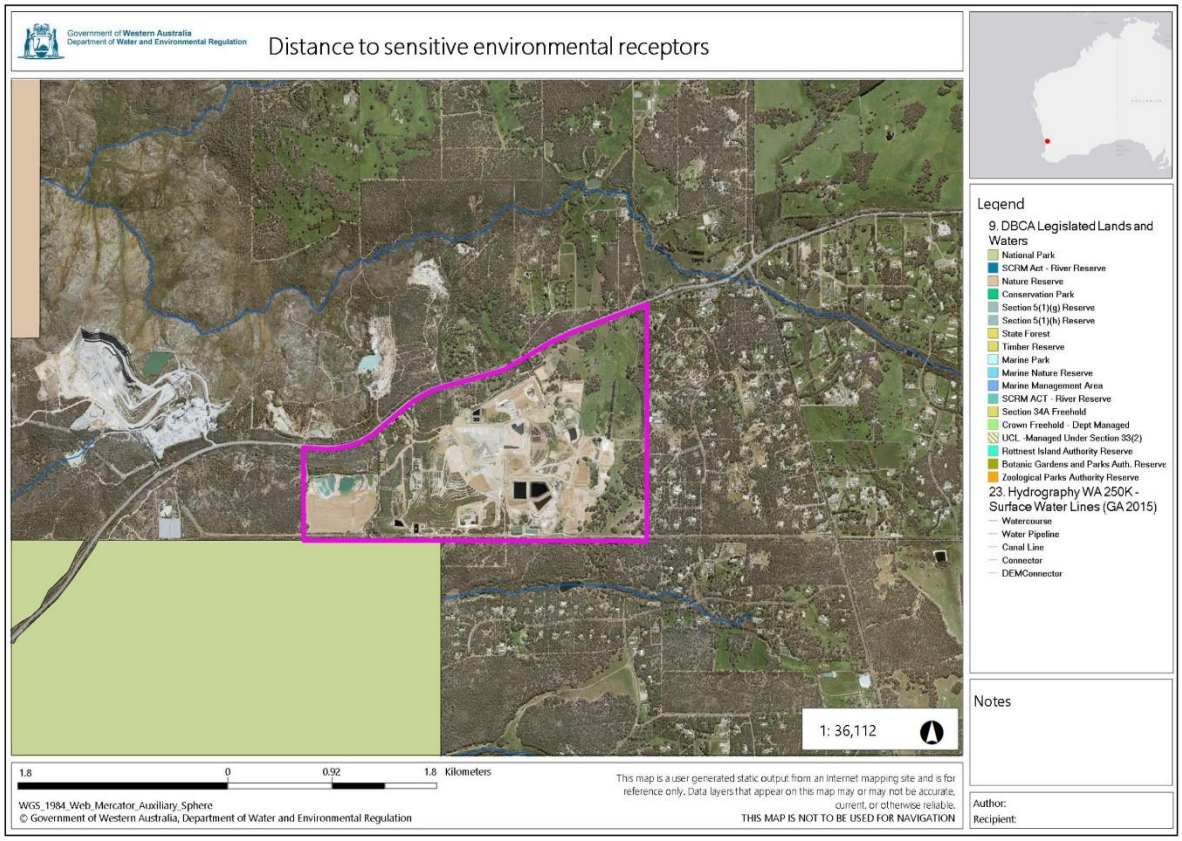

Figure 1: Distance to sensitive receptors

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 takes into account 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 L8889/2015/2 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 Event					Risk rating[1] C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions[2] of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
Operation								
Category 64 Acceptance and burial of wastes including Contaminated Solid Waste, Inert Waste Types 1 and 2, Putrescible Waste and Special Waste Types 1, 2 and – additional 200,000 tonnes accepted per annual period	Odour	Air / windborne pathway causing impacts to health and amenity	Closest residential premises approximately 500 m from site activities	Refer to Section 3.1	C = Moderate L = Possible **Medium Risk**	Y	Existing conditions 1 to 5, 9 to 15, 37 and 38. **Conditions 13A, 37A to 37D**	The Delegated Officer considers the increase in waste acceptance is likely to result in odour emissions which are compatible to those assessed in previous licence amendments with the adoption of additional controls as proposed by the applicant. As such, the previously proposed emission controls for odour along with additional controls proposed by the applicant are acceptable to manage potential odour emissions. To confirm the appropriateness of current applicant and regulatory controls to mitigate odour emissions, the Delegated officer has included requirements for a series of Odour Field Assessments (OFAs) will be undertaken at different operational milestones – when waste acceptance rate is 400,000 tonnes per annum and another when acceptance rate is 500,000 tonnes per annum. This will allow the Department to determine any potential variability on odour emissions from waste acceptance rates, and instigate further regulatory controls if necessary. Condition 13A has been included to account for the licence holder's current process for the acceptance of highly odourous waste at the weighbridge. Conditions 37A and 37B have been included to account for the licence holder's current gas monitoring program, with H2s, Volatile organic compounds and ammonia monitored fortnightly to detect leaks in the landfill gas pipelines. Corrective actions have been added following the identification of any non-standard readings. Following the commencement of increased

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions[2] of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Licence Holder's controls**				
								waste acceptance, the Department will monitor odour related issues and complaints and may consider implementing further regulatory controls to mitigate key odour emitting activities.
Category 67A Acceptance and processing of FOGO material for composting. Use of forward and reverse aeration modes for the Mobile aerated floors					C = Moderate L = Possible **Medium Risk**	Y	Existing conditions 1 to 5, 9 to 15, 37 and 38.	The Delegated Officer has considered the recent determination on appeal 10-25 in considering amendments to FOGO operations onsite. A slow speed shredder has been added as the very first stage of processing prior to trommeling, which then leads onto the first of the MAFs. The slow speed shredder breaks down the oversized garden organics (branches, stumps) that would have otherwise ended up in landfill and also opens closed FOGO Bags and non-FOGO plastic bags releasing the food waste within, which simple trommeling cannot achieve. The applicant has advised that the reverse MAF is not required with the introduction of the above infrastructure and requested that the requirement is removed from the licence. The Delegated Officer accepts the applicants claim that as operator experience with onsite processes has developed, the required reverse aeration mode has been acknowledged as ineffective and that greater flexibility in use of the MAFs may benefit improved operational flexibility whilst retaining odour performance. It is also expected that a roof structure will be in place by the end of the year which will stop the earlier unmatured FOGO from becoming too saturated. The Delegated Officer considers the increase in waste acceptances and change in FOGO processing does not alter the nature and extent of potential odour emissions to that assessed in previous licence amendments and as such considers previously proposed emission controls

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions[2] of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
								for odour are acceptable to manage potential odour emissions. The Delegated Officer considers that the amendments do not alter the considerations or determination of appeal 10-25.
Category 64 Acceptance and burial of wastes including Contaminated Solid Waste, Inert Waste Types 1 and 2, Putrescible Waste and Special Waste Types 1, 2 and – additional 200,000 tonnes accepted per annual period	Dust	Air / windborne pathway causing impacts to health and amenity	Closest residential premises approximately 500 m from site activities	Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	Y	Existing conditions 4 and 5	The Delegated Officer considers the existing regulatory controls in conjunction with licence holder controls are likely to be sufficient in mitigating dust emissions associated with the increased waste acceptance. The delegated officer considers that the distance to receptors also provides adequate mitigation of dust emissions.
Category 64 Acceptance and burial of wastes including Contaminated Solid Waste, Inert Waste Types 1 and 2, Putrescible Waste and Special Waste Types 1, 2 and – additional 200,000 tonnes accepted per annual period	Noise	Air / windborne pathway causing impacts to health and amenity	Closest residential premises approximately 500 m from site activities	Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	Y	Existing conditions 4 and 5 **Condition 18B**	The Delegated Officer considers noise emissions to be effectively regulated by the *Environmental Protection (Noise) Regulations 1997*. The Delegated Officer considers due to the nature of the relatively constant operations at the premises, no increase in noise emissions from levels currently produced is expected from the increased waste acceptance. However it is anticipated that duration of noise events may be extended due to increased truck and plant movement due to increased waste volumes accepted and disposed of onsite. The premises currently involves the daily operation of various machinery and increased activity is expected to be offset by applicant's commitment to adopting broadband alarms (adopted as condition 18D). The Delegated Officer considers that with this additional control, it is unlikely that the increase in waste acceptance will result in a perceivable increase in noise from the perspective of the nearest

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions[2] of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
								sensitive receptor.
Category 64 Acceptance and burial of wastes including Contaminated Solid Waste, Inert Waste Types 1 and 2, Putrescible Waste and Special Waste Types 1, 2 and – additional 200,000 tonnes accepted per annual period	Windblown waste	Air/wind dispersion of waste causing visual amenity and nuisance impacts	Closest residential premises approximately 500 m from site activities John Forrest National Park	Refer to Section 3.1	C = Minor L = Rare **Low Risk**	Y	Existing conditions 4, 5 and 9 to 15	The Delegated Officer considers that the licence holder's proposed windblown waste mitigation controls are likely to be sufficient at mitigating windblown waste emissions associated with the proposed increase of Category 64 waste acceptance.
Category 64 Acceptance and burial of wastes including Contaminated Solid Waste, Inert Waste Types 1 and 2, Putrescible Waste and Special Waste Types 1, 2 and – additional 200,000 tonnes accepted per annual period	Potentially contaminated stormwater	Overland runoff potentially causing ecosystem disturbance or impacting surface water quality	Christmas Tree Creek 0.32km south Susannah Brook 0.35km north-east Groundwater approximately 6 mbgl. John Forrest National Park	Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	Y	Existing conditions 4, 5, 7 and 8	The Delegated Officer considers that the licence holder's proposed controls are likely to be sufficient at mitigating contaminated stormwater emissions associated with the proposed increase of Category 64 waste acceptance.
Category 64 Acceptance and burial of wastes including Contaminated Solid Waste, Inert Waste Types 1 and 2, Putrescible Waste and Special Waste Types 1, 2 and – additional 200,000 tonnes accepted per annual period	Leachate	Surface water or groundwater infiltration potentially causing deterioration of surface water and groundwater quality and impacts to freshwater and terrestrial ecosystems	Christmas Tree Creek 0.32 km south Susannah Brook 0.35 km north-east Groundwater approximately 6 mbgl.	Refer to Section 3.1	C = Major L = Unlikely **Medium Risk**	Y	Existing conditions 1 to 6 and 25 to 27	The Delegated Officer considers the increase in waste acceptance does not alter the nature and extent of potential leachate emissions to that assessed in previous licence amendments, due to the final volume of the landfill cells being unaltered, and as such, considers previously proposed emission controls acceptable to manage potential leachate emissions.

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions[2] of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Licence Holder's controls**				
Category 64 Acceptance and burial of wastes including Contaminated Solid Waste, Inert Waste Types 1 and 2, Putrescible Waste and Special Waste Types 1, 2 and – additional 200,000 tonnes accepted per annual period	Fugitive gas	Air / windborne pathway causing impacts to health and amenity	Closest residential premises approximately 500 m from site activities	Refer to Section 3.1	C = Minor L = Rare **Low Risk**	Y	Existing conditions 4, 5, and 30 to 32 **Conditions 37A and 37B**	Conditions 37A and 37B have been included to account for the licence holder's current gas monitoring program, with H2s, Volatile organic compounds and ammonia monitored fortnightly to detect leaks in the landfill gas pipelines. Corrective actions have been added following the identification of any non-standard readings. The Delegated Officer considers the increase in waste acceptance does not alter the nature and extent of potential fugitive gas emissions to that assessed in previous licence amendments and as such, considers previously proposed emission controls acceptable to manage potential fugitive gas emissions.
Category 64 Acceptance and burial of wastes including Contaminated Solid Waste, Inert Waste Types 1 and 2, Putrescible Waste and Special Waste Types 1, 2 and – additional 200,000 tonnes accepted per annual period	Fire event - Particulates, noxious gases, smoke and ash	Air / windborne pathway causing impacts to health and amenity	Closest residential premises approximately 500 m from site activities	Refer to Section 3.1	C = Major L = Rare **Medium Risk**	Y	Existing conditions 1 to 5 and 16 to 20	The Delegated Officer considers the risks from fire events are effectively regulated by the applicant's infrastructure and operational controls.
Category 64 Acceptance and burial of wastes including Contaminated Solid Waste, Inert Waste Types 1 and 2, Putrescible Waste and Special Waste Types 1, 2 and – additional 200,000 tonnes accepted per	Fire event - firewater	Discharge to surface water or infiltration to groundwater causing degradation of water quality and potential impacts to down-gradient ecosystems	Christmas Tree Creek 0.32km south Susannah Brook 0.35km north-east Groundwater approximately 6 mbgl.	Refer to Section 3.1	C = Major L = Rare **Medium Risk**	Y		

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions[2] of licence	Justification for additional regulatory controls/ DWER comments
Source/Activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Licence Holder's controls**				
annual period								
Category 64 Acceptance and burial of wastes including Contaminated Solid Waste, Inert Waste Types 1 and 2, Putrescible Waste and Special Waste Types 1, 2 and – additional 200,000 tonnes accepted per annual period	Vectors/vermin	Air / windborne pathway causing impacts to health and amenity	Closest residential premises approximately 500 m from site activities	Refer to Section 3.1	C = Minor L = Unlikely **Medium Risk**	Y	Existing conditions 4 and 5 **Condition 18A**	Condition 18A has been included to account for the licence holder's current pest management program. The Delegated Officer considers impacts from vectors are effectively regulated by the applicant's controls and existing regulatory controls at the premises.

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 department.

4. Consultation

Table 5 provides a summary of the consultation undertaken by the department.

Table 5: Consultation

Consultation method	Comments received	Department response
Application advertised on the department's website (12/01/2026)	None received	N/A
Local Government Authority advised of proposal (12/01/2026)	None received	N/A
Licence Holder was provided with draft amendment on 24 March 2026	Refer to Appendix 1	Refer to Appendix 1

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 6 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 6: Summary of licence amendments

Condition no.	Proposed amendments
1	Category 64 throughput limit amended to 550,000 tonnes per annual period.
4, Table 2	Removal of FOGO waste storage at the Green waste processing hardstand. References to reverse aeration modes for the Mobile aerated floors removed. References to biofilter and odour defence system removed.
5, Table 3	Changes to FOGO acceptance and processing applied, including the addition of slow speed shredding.
13A	Addition of acceptance and disposal process for highly odourous waste.
18A	Addition to undertake biannual pest control programs.
18B	Addition of vehicles requiring broadband reversing alarms.
37A	Addition to undertake fortnightly ambient gas monitoring using a photoionization detector (PID).

37B	Addition of corrective measures following non-standard readings from the PID.
37C	Addition of Odour Field Assessments (OFA) to be completed during specific waste acceptance milestones.
37D	Details for the content of the OFA reports.
37E	Requirement to submit reports following the completion of each OFA campaign.
Definitions	Updated to reflect terminology in the amendment
Schedule 1: Maps	Updated prescribed premises boundary.

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.

Appendix 1: Summary of Licence Holder's comments on risk assessment and draft conditions

Condition	Summary of Licence Holder's comment	Department's response
4 Table 2	Please note that standard mode for the MAFs is forward, which pushes air through the FOGO. The Biofilter can only be used in reverse mode (pulling air). The odour defence system/ biofilter played an integral part when FOGO was introduced as raw material was placed directly onto this MAF in reverse to remove odours in Raw material. Since the introduction of the slow speed shredder and the trommelling of incoming material, odour levels have considerably reduced. Also with the rapid increase in tonnages, any material on the MAF in reverse mode would only be there for a minimal amount of time before it is rotated onto a normal MAF. This would negate much of the odour defence system/ biofilter use. We propose to convert this to a normal MAF system allowing for more material to be processed.	The delegated officer accepts the applicants claim that as operator experience with onsite processes has developed, the required reverse aeration mode has been acknowledged as ineffective and that greater flexibility in use of the MAFs may benefit improved operational flexibility whilst retaining odour performance. With the removal of the reverse aeration, the associated biofilter and odour defence system are no longer required. Forward aeration mode through the addition of air into compost piles to maintain aeration will continue and provides a significant control to manage odour emissions. References to the biofilter and the odour defence system have been removed from the table.
13A	The licence holder queried if the condition relates primarily regarding the likely significant increase in municipal waste? The only significantly odorous material, apart from possibly municipal waste, accepted over the weighbridge are as follows: - FOGO for processing. - Occasional loads of Waste Water Treatment Plant (WWTP) material. - Occasional loads of dead animals. The WWTP material and dead animals are covered immediately and the municipal waste is covered at end of day.	The delegated officer added the condition based on the licence holder's current operational control provided during submission. To provide more rigour around regulatory odour mitigation controls, the condition has been added to reflect current operational practice.
18A	The EMRC already undertake two spotlighting/shooting events per year, two fox/cat trapping programs per year, and release RHD Virus in treated carrots once per year for rabbit control. Additionally, we have ten Canid Pest Ejectors (CPEs) onsite which target foxes specifically and are regularly camera monitored and re-baited as required.	The delegated officer notes the response, with the condition added to reflect the current operational practice.

Condition	Summary of Licence Holder's comment	Department's response
18B	The EMRC/ Red Hill staff are unable to police for the presence of broadband reversing alarms for our customers.	The delegated officer notes the response, with the condition added to reflect the current operational practice. The condition acknowledges that it only applies to those vehicles within the licence holder's control.
37A	The EMRC already has a MultiRAE Lite PID with built in pump. This was purchased in 2024 and is sent for calibration every 6 months. The EMRC already undertakes fortnightly monitoring at eight locations around Red Hill as part of our due diligence. Also attached is a plan showing the current eight locations plus an additional location to the south of the active tip-face (to make nine). Please note that the tip-face locations will move along with the currently active cell.	The delegated officer acknowledges the locations provided in the map, and has added the map into the licence figures, noting that locations may change due to operational changes.
37B	Average and upper concentrations encountered over past 18 months were provided. The PID is of limited use when it comes to odour, although the PID is useful for detecting smelly compounds such as ammonia. To date the PID has not detected concentrations of compounds that could be indicative of associated odour concerns at site boundaries. If compounds of concern are detected at significant levels in future (can the DWER please assist us here in defining what constitutes an elevated reading in a landfill setting), this would be immediately communicated to the Red Hill Ops team who would then seek to neutralise the issue to the best of their ability - i.e. cease moving of FOGO, cover offending area of tip-face, identify damaged landfill gas pipework/ manifold for repair.	The delegated officer acknowledges the corrective measures to be undertaken, and confirms that non standard conditions can be considered as measurements that significantly deviate from average measurements, indicating that operational conditions may have changed.
37C(a)	At any time, at least two of the EMRC Compliance Team have their noses calibrated and are able to undertake odour monitoring. This currently occurs in an as required manner or at least six times per annum. Is it apprpriate for EMRC staff to undertake this monitoring or should this be via a third party? Regarding the 400,000T and 500,000T receipt marks, I think it unlikley that 400,000T would be crossed before Sep each year, and 500,000T Dec each year. based on this the OFAs may not be completed before March of the following calendar year which may put pressure on the delivery of the AER and AACR by 30 April each year. There is also a chance that the 500,000T limit will not be crossed each calendar year. Also, finally, the assumption by the EMRC is that the 400,000 T and 500,000 T are applicable only to Category 64 waste, not the combined	The delegated officer confirms that the OFAs have to be undertaken by an external consultant qualified to meet the requirements of 37C(b). The delegated officer acknowledges the ambiguous phrasing of the condition relating to 400,000 and 500,00 tonnes per annual period and has amended the condition to clarify the intent. The intent of the condition is not to conduct an OFA each year when the acceptance threshold is reached. Rather, the intent is to undertake an OFA campaign (of 3 OFAs) at the first occurrence of average annual waste acceptance volumes exceeding 4000,000 and 500,000 tonnes. Once this OFA campaign is completed, further OFAs are not required for subsequent years when the threshold is met. This will provide odour details and verify any changes from the increased waste acceptance levels. A period within six months of the first

Condition	Summary of Licence Holder's comment	Department's response
	tonnage of all material received (Cat 64, Cat 65, Cat 67A, etc...). Can you please confirm this.	occurrence of average annual waste acceptance levels reaching the threshold will allow greater flexibility to account for meteorological and operational conditions most likely to cause impacts at receptors.
37C(b)	Where feasible, as these works are most likely to take place late Spring and Summer only. Please confirm the time period.	The delegated officer has amended the condition to clarify the time period to be undertaken.