



Application to renew a licence

Division 3, Part V *Environmental Protection Act 1986*

| | |
|-----------------------|--|
| Licence Number | L8585/2011/2 |
| Licence Holder | Peel Resource Recovery Pty Ltd |
| ACN | 149 428 697 |
| File Number | 2011/006756-1~1 |
| Premises | Pinjarra Transfer Recycling Facility Lot 100 on Deposited Plan 408156 49 Munday Avenue PINJARRA WA 6208 As defined by the coordinates in Schedule 1 of the Licence |
| Date of Report | 10 September 2025 |
| Decision | To grant a licence |

1. Decision summary

This decision report documents the assessment of potential risks to the environment and public health from emissions and discharges during the operation of the premises. As a result of this assessment, licence L8585/2011/2 has been granted.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this decision report, the Department of Water and Environmental Regulation (the department; DWER) 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 Background

Pinjarra Transfer Recycling Facility (the facility) is a waste transfer recycling station located in the town of Pinjarra, approximately 86 kilometres south of Perth. It is located in the Pinjarra Industrial Estate and surrounded by rural dwellings and activities.

The facility accepts waste building materials and green waste from the greater Bunbury region for receipt, handling, mechanical sorting, hand sorting, crushing, screening, stockpiling and storage of Inert Waste Type 1, Inert Waste Type 2 and putrescible waste.

2.3 Application summary

On 1 May 2025 Peel Resource Recovery Pty Ltd (licence holder) applied to renew licence L8585/2011/1, as the licence is due to expire on 11 September 2025.

The licence relates to the facility with existing prescribed premises categories as described in Table 1.

Table 1: Premises category description and production design capacity

| Prescribed premises category description (Schedule 1, Environmental Protection Regulations 1987) | Production / design capacity |
|--|----------------------------------|
| Category 62: Solid waste depot – premises on which waste is stored or sorted pending final disposal or reuse | 100,000 tonnes per annual period |
| Category 13: Crushing of building material: premises on which waste building or demolition material (for example, bricks, stones or concrete) is crushed or cleaned. | 60,000 tonnes per annual period |

The renewal application does not propose any changes to premises categories or production/design capacity listed in Table 1.

The Annual Environmental Report (AER) requirements for this licence have been removed to reflect the *Notice of amendment of licence reporting requirements* (2022).

The waste acceptance procedure is shown below in Figure 1.

WASTE ACCEPTANCE PROCEDURE PINJARRA TRANSFER STATION

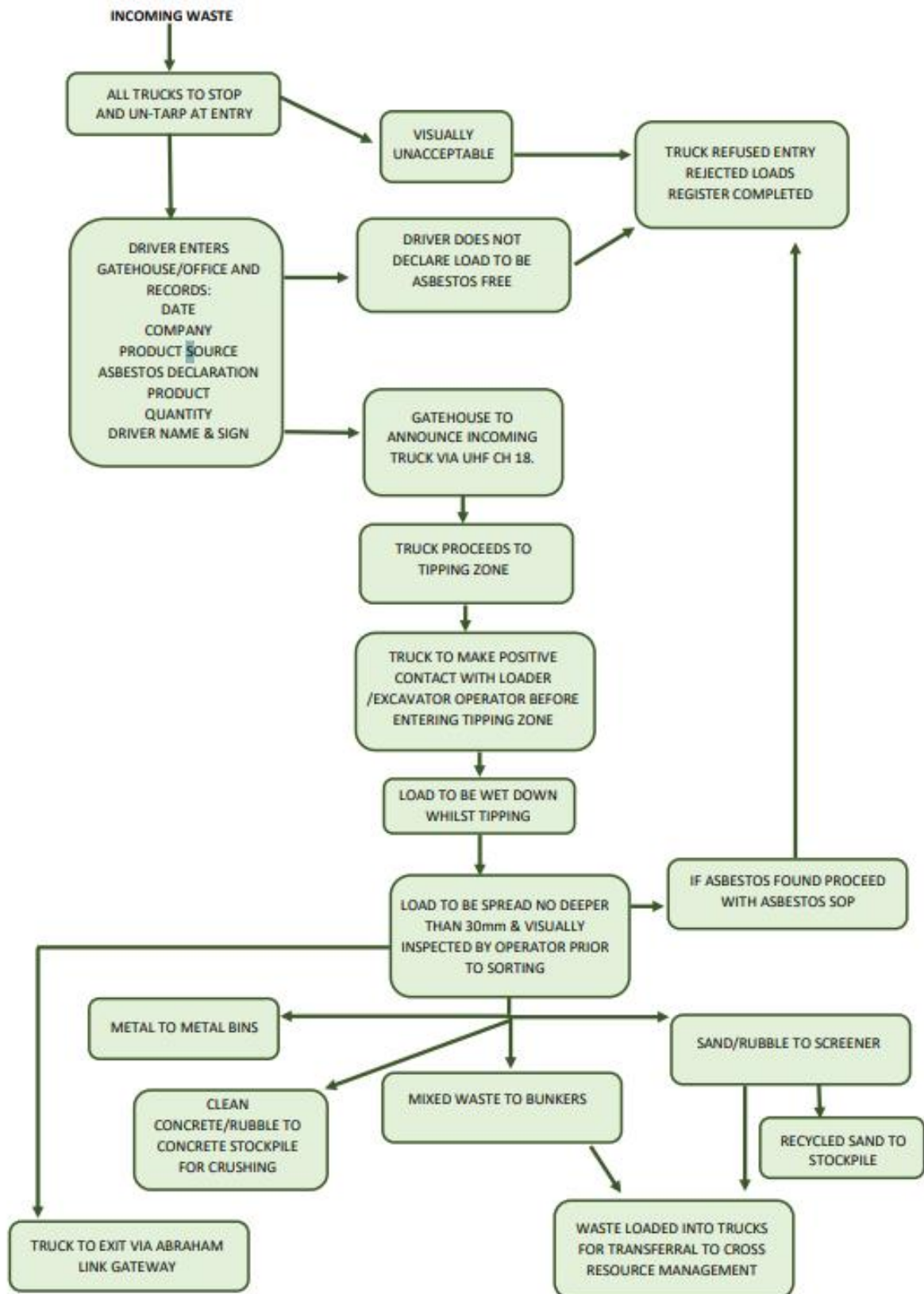


Figure 1: Waste acceptance procedure

3. Considerations for issuing a new licence

3.1 Compliance and enforcement actions

On 9 December 2019, DWER Environmental Compliance Officers undertook a compliance inspection of the premises. During this inspection it was identified that the licence holder was operating outside of the prescribed premises boundary. It was also identified that the screener was situated in an area contrary to the existing licence and that it was not of the type specified on the Licence.

On 9 December 2019 the licence holder submitted an application to amend L8585/2011/1, requesting to amend the premises boundary. The licence holder advised that the adjacent land had been purchased and amalgamated into one Lot (Lot 100). The Pinjarra Transfer Station had consequently expanded onto this land and is now using this area to stockpile gravel, limestone, fill sand, screened brickies sand, recycled crushed concrete, recycled hotmix, clean concrete, and clean asphalt/bitumen. The approximate height of stockpiles is two metres and the licence holder advised that stockpiles will not exceed five metres. The licence holder advised that sprinklers are allocated to each stockpile and each stockpile is wetted down regularly to maintain dust.

On 11 March 2025, DWER conducted a further compliance inspection. The purpose of the inspection was to assess the operational and regulatory controls in place to manage and mitigate environmental impacts, in accordance with licence L8585/2011/1. No material issues were identified at the time of inspection.

4. 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.

4.1 Source-pathways and receptors

4.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises operation which have been considered in this decision report are detailed in Table 3 below. Table 3 also details the control measures the applicant has proposed to assist in controlling these emissions, where necessary.

Table 2: Proposed applicant controls

| Emission | Sources | Potential pathways | Proposed controls |
|----------|---|-----------------------|--|
| Dust | Crushing and screening of material Vehicle movements | Air/windborne pathway | Crushing & screening only operating between 9am-4pm one day per week Machine noise specification does not exceed 60 dB Located in industrial estate with closest |

| Emission | Sources | Potential pathways | Proposed controls |
|-------------------------|----------------------------------|----------------------------------|---|
| | | | <p>resident 260m east of premises</p> <p>Bund wall has been constructed along eastern boundary</p> <p>Existing sprinkler and misting system accessing all storage areas and vehicle traffic areas</p> <p>Crusher and screener fitted with internal sprinkler systems</p> <p>Site is fully sealed with gradients directed towards silt traps which are regularly maintained</p> |
| Noise | | | <p>Concrete pad beneath sorting shed</p> <p>Bitumen hardstand surrounds shed</p> <p>Site speed limit 8kpm</p> |
| Dust | Stockpiling of putrescible waste | Air/windborne pathway | <p>Located in industrial estate with closest resident 260m east of premises</p> <p>Bund wall has been constructed along eastern boundary</p> |
| Odour | | | <p>Only green waste accepted</p> <p>Crushed glass is no longer accepted</p> <p>Putrescible waste not processed on site</p> <p>Putrescible waste stored on concrete hardstand and removed from site regularly (weekly)</p> |
| Contaminated stormwater | | Seepage to soils and groundwater | <p>Stringent waste acceptance procedures in place - all loads inspected for compliance</p> <p>Facility only accepts inert waste type 1 & 2, and green waste - no hazardous/liquid waste accepted</p> <p>All waste processed on concrete/bitumen hardstand</p> <p>Site is fully sealed with gradients directed towards regularly maintained silt traps</p> <p>Swales have been constructed at premises boundary (south & west)</p> |
| Fire washwater | Stockpiling of tyres | Seepage to soils and groundwater | Stored on concrete hardstand |
| Asbestos fibres | Non-compliant C & D waste | Air/windborne pathway | <p>Waste acceptance procedure (Figure 1) and licence conditions followed at all times.</p> <p>Adhere to Asbestos Management Plan (AMP)</p> |

4.1.2 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 4 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 | Approximately 230m east of the premises boundary. Approximately 275m east of the premises boundary. |
| Commercial Premises | Adjacent and surrounding premises boundary. |
| Environmental receptors | Distance from prescribed activity |
| Peel Harvey Environmental Protection Policy (EPP) area | Prescribed premises located within Policy area |
| Rights in Water and Irrigation Act 1914 – Murray Groundwater Area | Prescribed premises located within the proclaimed groundwater area |
| Groundwater | Depth to groundwater is approximately 2mbgl. |
| Resource Enhancement Wetland - Palusplain | Approximately 450m north of the prescribed premises boundary |

4.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for each identified emission source and takes into account potential source-pathway and receptor linkages as identified in Section 4.1. Where linkages are incomplete, they have not been considered further in the risk assessment.

Where the applicant has proposed mitigation measures/controls (as detailed in Section 4.1), these have been considered when determining the final risk rating. Where the delegated officer considers the applicant'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 applicant's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 4.

Licence L8585/2011/2 that accompanies this decision report authorises emissions associated with the operation of the premises

The conditions in the issued licence, as outlined in Table 4 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 |
|--|---|--|---|---------------------------|---|---------------------------------------|------------------------------------|--|
| Source/Activities | Potential emission | Potential pathways and impact | Receptors | Licence holder's controls | | | | |
| Screening, crushing, unloading and loading of waste Vehicle movements | Dust | Air/windborne pathway causing impacts to health and amenity | Residences 230m east of premises boundary | Refer to Section 4.1 | C = Moderate L = Possible Medium Risk | Y | 14 and 20 | The delegated officer considers the licence holder's controls sufficient to mitigate potential dust emissions generated by prescribed activities at the premises. |
| | Noise | | Commercial Premises adjacent and surrounding | | C = Moderate L = Possible Medium Risk | Y | 20 | The delegated officer also considers that the provisions of the Environmental Protection (Noise) Regulations 1997 (WA) and existing licence conditions are sufficient to regulate noise emissions. |
| | Contaminated or sediment laden stormwater | Overland runoff potentially causing ecosystem disturbance or impacting surface water quality Leaching through soil profile into groundwater | Resource Enhancement Wetland – Palusplain 450m north of premises boundary Peel Harvey EPP area Murray Groundwater Area Groundwater 2mbgl | Refer to Section 4.1 | C = Moderate L = Possible Medium Risk | N | 1, 14 & 20 19 | The delegated officer considers the licence holder's controls insufficient to mitigate the potential discharge of contaminated stormwater emissions generated by prescribed activities from the premises. An additional condition has been added to the licence to mitigate this risk. |
| Stockpiling of putrescible waste (green waste) | Dust | Air/windborne pathway causing impacts to health and amenity | Residences 230m east of premises boundary | Refer to Section 4.1 | C = Minor L = Rare Low Risk | Y | 1, 14 & 20 | The delegated officer considers the licence holder's controls sufficient to mitigate potential dust emissions generated by prescribed activities at the premises. |
| | Odour | | Commercial Premises adjacent and surrounding | | C = Minor L = Rare Low Risk | Y | 1, 14 & 20 | The delegated officer considers the licence holder's controls sufficient to mitigate potential odour emissions generated by prescribed activities at the premises. |

| Risk Event | | | | | Risk rating ¹ C = consequence L = likelihood | Licence Holder's controls sufficient? | Conditions ² of licence | Justification for additional regulatory controls |
|---|--------------------|---|--|---------------------------|---|---------------------------------------|------------------------------------|---|
| Source/Activities | Potential emission | Potential pathways and impact | Receptors | Licence holder's controls | | | | |
| Stockpiling of tyres (up to 25 tyres at one time) | Fire washwater | Leaching through soil profile into groundwater | Peel Harvey Environmental Protection Policy area Murray Groundwater Area Groundwater 2mbgl | Refer to Section 4.1 | C = Minor L = Rare Low Risk | Y | N/A | Due to the low number of tyres stockpiled on the premises the delegated officer considers the licence holder's controls sufficient to mitigate potential fire washwater emissions generated by prescribed activities at the premises in a fire event. |
| Transport of non-compliant waste (asbestos or ACM) within the premises. | Asbestos fibres | Air/windborne pathway causing impacts to health | Residences 230m east of premises boundary Commercial Premises adjacent and surrounding | Refer to Section 4.1 | C = Moderate L = Unlikely Medium Risk | Y | 1-14, 20 | The delegated officer considers the licence holder's controls sufficient for the mitigation and management of asbestos risk. |

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.

5. Consultation

The delegated officer undertook the consultation for the application to renew the licence as per Table 5.

Table 5: Consultation

| Consultation method | Comments received | Delegated officer's response |
|---|--|--|
| Local Government Authority advised of proposal on 25 July 2025. | <p>The Shire of Murray replied on 1 August 2025 stating:</p> <ul style="list-style-type: none"> • Applicant has valid development approval (issued in Dec 16) for 'stockpiling and bunkers' • Concerns that due to the close proximity of waste to the premises boundary stormwater may exit the premises from the driveway onto the street bypassing silt traps and swales. | <p>Stormwater management on developed land in WA is primarily the responsibility of the relevant planning authority, guided by local planning schemes under <i>the Planning and Development Act 2005</i>. These schemes determine permissible land uses and associated infrastructure requirements.</p> <p>Under Part V, Division 3 of the <i>EP Act</i>, regulation imposed by a licence or works approval is aimed at managing stormwater which is likely to have been impacted by prescribed activities, rather than all stormwater on site. The focus is on minimising the risk of contamination and managing any stormwater that is likely to be impacted.</p> <p>As outlined in Table 4, the delegated officer has imposed additional regulatory controls to reduce the risk of stormwater contaminated by prescribed activities being discharged from the premises.</p> |
| The licence holder was provided with draft documents on 11 August 2025. | <p>The licence holder replied on 27 August 2025 with the following requests:</p> <ul style="list-style-type: none"> • Amend Table 3 to allow the crusher and screen to operate no more than 15 hours per week. <p>The licence holder submitted compliance documentation for the crusher, screen and irrigation system to demonstrate compliance with the existing licence conditions 22 and 23.</p> | <p>Noted and amended.</p> <p>The delegated officer has considered this operational change request in its risk assessment in Section 4. The delegated officer does not believe this change to the licence poses and additional risk to the health and amenity of nearby receptors.</p> |

6. Conclusion

Based on the assessment in this decision report, the delegated officer has determined that the application to renew licence L8585/2011/1 will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. Department of Water and Environmental Regulation (DWER) 1997, *Environmental Protection (Noise) Regulations 1997 (WA)*, Perth, Western Australia
3. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
4. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.