Government of Western Australia
Department of Water and Environmental Regulation

Licence

Licence number	L3032/2025/1
Licence holder	Complete Tyre Solutions Tyre Recycling Pty Ltd
ACN	644 200 528
Registered business address	283 Rokeby Road SUBIACO WA 6008
DWER file numbers	INS-0003032 APP-0029379
Duration	09/10/2025 to 08/10/2045
Date of issue	9 October 2025
Premises details	CTS Tyre Recycling 82 and 86 Altitude Drive NEERABUP WA 6031 Legal description - Lot 104 on Deposited Plan 426671 and Lot 105 on Deposited Plan 425769

Prescribed premises category description (Schedule 1, *Environmental Protection Regulations 1987*)	**Assessed production / design capacity**
Category 57: Used tyre storage (general): premises (other than premises within category 56) on which used tyres are stored.	Up to 250,000 tyres at any one time
Category 61A: Solid waste facility: premises (other than premises within category 67A) on which solid waste produced on other premises is stored, reprocessed, treated or discharged onto land.	30,000 tonnes per annual period

This licence is granted to the licence holder, subject to the attached conditions, on 9 October 2025, by:

Gemma Dorman

Digitally signed by Gemma Dorman
Date: 2025.10.09 17:18:35 +08'00'

MANAGER, WASTE INDUSTRIES

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

Licence history

Date	Reference number	Summary of changes
17/10/2024	W6848/2023/1	Works approval granted.
29/05/2025	W6848/2023/1	Extension to time-limited operations to allow for submission and assessment of a licence application.
09/10/2025	L3032/2025/1	Licence granted.

Interpretation

In this licence:

(a) the words 'including', 'includes' and 'include' in conditions mean "including but not limited to", and similar, as appropriate;

(b) where any word or phrase is given a defined meaning, any other part of speech or other grammatical form of that word or phrase has a corresponding meaning;

(c) where tables are used in a condition, each row in a table constitutes a separate condition;

(d) any reference to an Australian or other standard, guideline, or code of practice in this licence:

  (i) if dated, refers to that particular version; and

  (ii) if not dated, refers to the latest version and therefore may be subject to change over time;

(e) unless specified otherwise, any reference to a section of an Act refers to that section of the EP Act; and

(f) unless specified otherwise, all definitions are in accordance with the EP Act.

NOTE: This licence requires specific conditions to be met but does not provide any implied authorisation for other emissions, discharges, or activities not specified in this licence.

Licence conditions

The licence holder must ensure that the following conditions are complied with:

Infrastructure and equipment

1. The licence holder must ensure that the site infrastructure and equipment listed in Table 1 and located at the corresponding infrastructure location is maintained and operated in accordance with the corresponding operational requirement set out in Table 1.

Table 1: Infrastructure and equipment requirements

	Site infrastructure and equipment	Operational requirement	Infrastructure location
1.	External waste tyre receival and storage area (Lot 104)	a) All waste tyres must be stored in accordance with GN02 as follows: i. Tyre stacks must not exceed 3.7 m in height, 60m^2 in area outdoors, 30m^2 indoors and 12.5 tonnes in weight (Figure 6). ii. Tyre stacks must not be grouped in more than 4 stacks (a tyre pile) and must be a minimum of 2.5m apart (Figure 6). iii. Tyre piles must be separated by a minimum of 18m (Figure 7). iv. Tyre stacks must be no closer than 6m from any non-combustible part of a premises boundary or building wall. v. Tyre stacks must be no closer than 18m from any combustible part of a boundary of an adjacent property allotment or combustible building wall. vi. A minimum clearance distance of 1 metre must be maintained along paths of travel to required exits and to firefighting equipment and be unobstructed at all times. b) Tyres must be stacked on their side; or if stored on their treads, must be suitably contained by a system to prevent rolling. c) Ground surface must be maintained free of cracks, damage and have a permeability of no greater than 1x10^{-9} m/s or equivalent. d) Premises must be secure at all times to prevent unauthorised access to the building and storage areas by persons not authorised to be on the premises. e) A perimeter vehicular access clearance of 6m must be clearly marked to allow emergency vehicles to access the waste storage areas during an emergency response. f) Two entry / exit points onto the site to be unobstructed and not less than 4m wide to allow emergency services vehicles access to the site.	As shown in Schedule 1, Figure 3, Figure 4 and Figure 5

	Site infrastructure and equipment	Operational requirement	Infrastructure location
2.	Warehouse and awning (Lot 105) containing: – Extended tyre storage area (under awning) – Tyre feeder (under awning) – Primary shredder (under awning) – Secondary shredder (Multi purpose rasper) – Granulator x2 – Classifier (textile/fabric separation) x2 – Aspirator (tyre granule classification) – Crackermill – Bulk bag filling stations with cooling augers x3 – Steel cleaning plant – Baghouse filter (dust extraction and air filtration system) – Plant conveyor line – Tyre crumb and tyre derived fuel product storage bays	a) North façade and east façade roller doors must remain closed during tyre shredding operations. b) Dust extraction and filtration systems must be fully functional at all times during the operation of the shredding and granulating plant and must be maintained as per manufacturers specifications. c) All shredded and crumbed tyre product must be stored in accordance with GN02 as follows: i. Tyre product must be stored within the warehouse area as shown in Schedule 1, Figure 2. ii. Tyre product must be stored within bulk bags no deeper than 3m. iii. Tyre product must be free of tyre remains subjected to fire, oil, grease, petrol and diesel fuels, fibrous organic matter or other material that could create a fire hazard. iv. A minimum of 3m is to be maintained from internal building walls. d) Spill kits to be available and restocked as necessary. e) A 1m clearance to be maintained internally within the building along paths of travel to exits and firefighting equipment.	As shown in Schedule 1, Figure 2, Figure 4 and Figure 5
3.	Surface water drainage system consisting of: - Surface water drainage grates - Sub-surface collection pits - Pipework and Isolation valves - Sub-surface soakage pits	a) Isolation valves must be maintained and operational on the sub-surface collection pits/pipework to enable the fire control system to isolate contaminated water from entering the soakage pits when a fire is detected. b) Subsurface drainage system is to be maintained free of debris and free of leaks and defects.	As shown in Schedule 1, Figure 4

	Site infrastructure and equipment	Operational requirement	Infrastructure location
4.	All on-site fire management and prevention equipment including: - Fire detection and alarm systems - Fire hose reels - Fire extinguishers - Fire hydrants - Fire sprinklers - Direct Brigade Alarm connection	a) All on-site fire management and prevention equipment to be stored so access is not impeded by infrastructure or equipment used in site operations. b) All on-site fire management and prevention equipment must be maintained and in good working order at all times in accordance with AS 1851. c) Automatic fire detection system to be connected to a Direct Brigade Alarm to immediately alert local Fire Emergency Services of a fire event. d) Fire hose reels to cover the entire premises, including the open yard and internal buildings. e) On-site fire extinguishers must be able to extinguish rubber fires.	Infrastructure and equipment partly shown in Schedule 1, Figure 5
5.	Fire and emergency response signage	a) The licence holder must maintain a sign at the site entrance of the premises that clearly displays the following information: (i) fire hose reels, hydrants and isolation points. (ii) all booster assembly cabinet locations and booster assembly arrangements. (iii) electrical isolation points. (iv) sub-surface drainage infrastructure, including details on flow direction and off-site discharge locations. (v) site contact telephone number. (vi) emergency services contact numbers.	Entrance to the premises

Waste acceptance

2. The licence holder must only accept onto the premises waste of a type that:

(a) does not exceed the rate at which that waste is received; and

(b) meets the relevant acceptance specification,

as set out in Table 2.

Table 2: Waste acceptance criteria

Waste type	Rate at which waste is received	Acceptance specification
Inert Waste Type 2 (tyres)	No more than 250,000 tyres to be stored on the premises at any one time	Whole, unburnt passenger, truck and OTR tyres. For the purposes of waste tyre volumes, 2m^3 of shredded, broken or pieces of used tyres are taken to equal 100 used tyres.

Note 1: Additional requirements for the acceptance of controlled waste (including tyres) are set out in the Environmental Protection (Controlled Waste) Regulations 2004.

Note 2: Calculating tyre quantities is set out in the Environmental Protection Regulations 1987.

3. Where waste does not meet the waste acceptance criteria set out in condition 2, the licence holder must:

(a) reject the waste; and

(b) record the details of the:

(i) waste (type and description);
(ii) source of the waste load;
(iii) name of the waste carrier;
(iv) registration number of the delivery vehicle; and
(v) date that the waste load was rejected; and

(c) maintain accurate and auditable records of all waste loads rejected from the premises.

4. The licence holder must ensure that where waste does not meet the waste acceptance criteria set out in condition 2, it is removed from the premises by the delivery vehicle or, where that is not possible, stored in a quarantined storage area or container and removed to an appropriately authorised facility as soon as practicable.

Waste processing

5. The licence holder must ensure that the waste types specified in Table 3 are only subjected to the corresponding processes, subject to the corresponding process limits and/or specifications.

Table 3: Waste processing

Waste type	Process(es)	Process limits and/or specifications
Inert Waste Type 2 (tyres and rubber pieces)	Shredding, crumbing, granulating and storage	a) Tyre shredding to occur within the warehouse and awning only. b) Tyre crumbing, granulating and crumb storage to occur within the warehouse only. c) No more than 30,000 tonnes of tyres and rubber pieces are to be processed per annual period.

Emissions and discharges

Spills of environmentally hazardous materials

6. The licence holder shall immediately recover, or remove and dispose of, spills of environmentally hazardous materials including fuel, oil, or other hydrocarbons, whether inside or outside an engineered containment system.

7. The licence holder shall ensure that all material used for the recovery, removal, and/or disposal of environmentally hazardous materials is stored in an impermeable container prior to disposal at an appropriately authorised facility.

Stormwater management

8. The licence holder must take all reasonable and practicable measures to prevent stormwater run-off becoming contaminated by the activities and operations undertaken at the premises.

Air emissions

9. The licence holder must ensure that the emissions specified in Table 4 are discharged only from the corresponding discharge point and does not exceed the limit when monitored in accordance with condition 12.

Table 4: Authorised discharge points and discharge limits

Emission	Discharge point	Discharge point height	Limit
Particulate matter	Emission point (E1) as labelled in Schedule 1, Figure 2	Minimum of 12.3 metres	< 5 mg/m^3

Fire and emergency management requirements

10. In the case of a fire on the premises, the licence holder must:

(a) ensure any fire on the premises is extinguished as soon as possible.

(b) ensure the sub-surface collection pit/pipework isolation valves are activated to contain firewater on the premises and prevent any discharge to the environment.

(c) ensure any contained firewater on the premises is removed by a carrier licensed under the Environmental Protection (Controlled Waste) Regulations 2004.

Monitoring

11. The licence holder must ensure that monitoring is undertaken in each quarterly period such that there are at least 45 days in between the days on which samples are taken in successive quarters.

12. The licence holder must monitor emissions to air in accordance with the requirements specified in Table 5.

Table 5: Monitoring of emissions to air

Monitoring location	Parameter	Reporting unit [1]	Frequency	Averaging period	Method
Emission point (E1) as labelled in Schedule 1, Figure 2	PM_{10}	mg/m^3 g/sec	Quarterly during tyre recycling operations	60 minutes	US EPA Method 201A
	TSP	-			US EPA Method 5
	Volumetric flow rate	m^3/sec			US EPA Method 2

Note 1: All units are referenced to STP dry.

13. The licence holder must record the total amount of waste accepted onto and removed from the premises, for each waste type listed in Table 6, in the corresponding unit, and for each corresponding time period, as set out in Table 6.

Table 6: Monitoring of waste accepted and removed the premises

Waste type	Unit	Frequency
Inert Waste Type 2 (tyres)	Tyres[1]	Each load entering the premises
Processed tyre material (tyre crumb, shred, chip, granular product and tyre derived fuel)	tonnes	Each load leaving the premises
Waste steel		

Note 1: Calculating tyre quantities is set out in the *Environmental Protection Regulations 1987*.

Records and reporting

Records

14. The licence holder must record the following information in relation to complaints received by the licence holder (whether received directly from a complainant or forwarded to them by the Department or another party) about any alleged emissions from the premises:

(a) the name and contact details of the complainant, (if provided).

(b) the time and date of the complaint.

(c) the complete details of the complaint and any other concerns or other issues raised.

(d) the complete details and dates of any action taken by the licence holder to investigate or respond to any complaint.

15. The licence holder must maintain accurate and auditable books including the following records, information, reports, and data required by this licence:

(a) the calculation of fees payable in respect of this licence.

(b) any maintenance of infrastructure that is performed in the course of complying with condition 1 of this licence.

(c) monitoring programmes undertaken in accordance with conditions 12 and 13 of this licence.

(d) complaints received under condition 14 of this licence.

16. The books specified under condition 15 must:

(a) be legible;

(b) if amended, be amended in such a way that the original version(s) and any subsequent amendments remain legible and are capable of retrieval;

(c) be retained by the licence holder for the duration of the licence; and

(d) be available to be produced to an inspector or the CEO as required.

Reporting

17. The licence holder must immediately notify the CEO of:

(a) any fire on the premises; and/or

(b) any accident, malfunction, or emergency which results or could result in the discharge of fire-fighting wash water or other wastes from the premises.

18. The licence holder must:

(a) undertake an audit of their compliance with the conditions of this licence during the preceding annual period, and

(b) prepare and submit to the CEO an Annual Audit Compliance Report in the approved form by 1 March each year.

19. The licence holder must:

(a) prepare an Environmental Report that provides information in accordance with Table 7 for the preceding annual period, and

(b) submit that Environmental Report to the CEO by 1 March each year.

Table 7: Environmental reporting requirements

	Condition	Requirement
1.	-	Summary of any failure or malfunction of any pollution control equipment and any environmental incidents that have occurred during the annual period and any action taken.
2.	6,7 and 10	Details of any fires or spills at the premises over the previous year, measures taken to put out the fire or contain the spill, and actions taken to store and remove materials used.
3.	12	Monitoring data of discharge to air.
4.	13	Summary of inputs and outputs data.
5.	14	Complaints summary.
6.	18	Summary of non-compliances reported during the annual period (AACR).

Definitions

In this licence, the terms in Table 8 have the meanings defined.

Table 8: Definitions

Term	Definition
ACN	Australian Company Number
Annual Audit Compliance Report (AACR)	means a report submitted in a format approved by the CEO (relevant guidelines and templates are available on the Department's website).
annual period	means a 12-month period commencing from 1 January until 31 December of the same year.
Australian Standard 1851	means Standards Australia *AS 1851 Maintenance of Fire Protection Systems and Equipment*
books	has the same meaning given to that term under the EP Act.
CEO	means Chief Executive Officer of the department. "submit to / notify the CEO" (or similar), means either: Director General Department administering the *Environmental Protection Act 1986* Locked Bag 10 Joondalup DC WA 6919 or: info@dwer.wa.gov.au
condition	a condition to which this licence is subject under section 62 of the EP Act.
delivery vehicle	means the vehicle in which the waste material was delivered.
department; DWER	means the department established under section 35 of the *Public Sector Management Act 1994* (WA) and designated as responsible for the administration of the EP Act, which includes Part V Division 3.
discharge	has the same meaning given to that term under the EP Act.
emission	has the same meaning given to that term under the EP Act.
EP Act	*Environmental Protection Act 1986* (WA)
EP Regulations	Environmental Protection Regulations 1987 (WA)
firewater	means water that, in the event of a fire, has been used to extinguish a fire, and all materials and combusting products dissolved or suspended within such water, and includes other fire suppressant substances such as foams.

Term	Definition
GN02	means the Department of Fire and Emergency Services *Guidance Note:GN02 Bulk Storage of Rubber Tyres Including Shredded and Crumbed Tyres*.
licence	refers to this document, which evidences the grant of a licence by the CEO under section 57 of the EP Act, subject to the specified conditions contained within.
licence holder	refers to the occupier of the premises, being the person specified on the front of the licence as the person to whom this licence has been granted.
OTR	means off-the-road
pile	relating to tyre storage, refers to a group of 4 tyre stacks separated by a minimum of 2.5m (as shown in Figure 6).
premises	refers to the premises to which this licence applies, as specified at the front of this licence and as shown on the premises map (Figure 1) in Schedule 1 to this licence.
prescribed premises	has the same meaning given to that term under the EP Act.
quarterly	means a three-month period commencing from 1 January to 31 March, 1 April to 30 June, 1 July to 30 September and 1 October to 31 December.
stack	relating to tyre storage, refers to a grouping of tyres not exceeding 3.7m in height, 60m^2 in area and/or 12.5 tonnes in weight.
US EPA Method 2	means the United States Environmental Protection Agency *Method 2 Determination of Gas Velocity and Volumetric Flow Rate (Type S Pitol Tube).*
US EPA Method 5	means the United States Environmental Protection Agency *Method 5 Determination of Particulate Matter Emissions from Stationary sources.*
US EPA Method 201A	means the United States Environmental Protection Agency *Method 5 Determination of PM_{10} and $PM_{2.5}$ Emissions from Stationary Sources (Constant Sampling Rate Procedure).*
waste	has the same meaning given to that term under the EP Act.

END OF CONDITIONS

Schedule 1: Maps

Premises map

The boundary of the prescribed premises is shown in the map below (Figure 1).

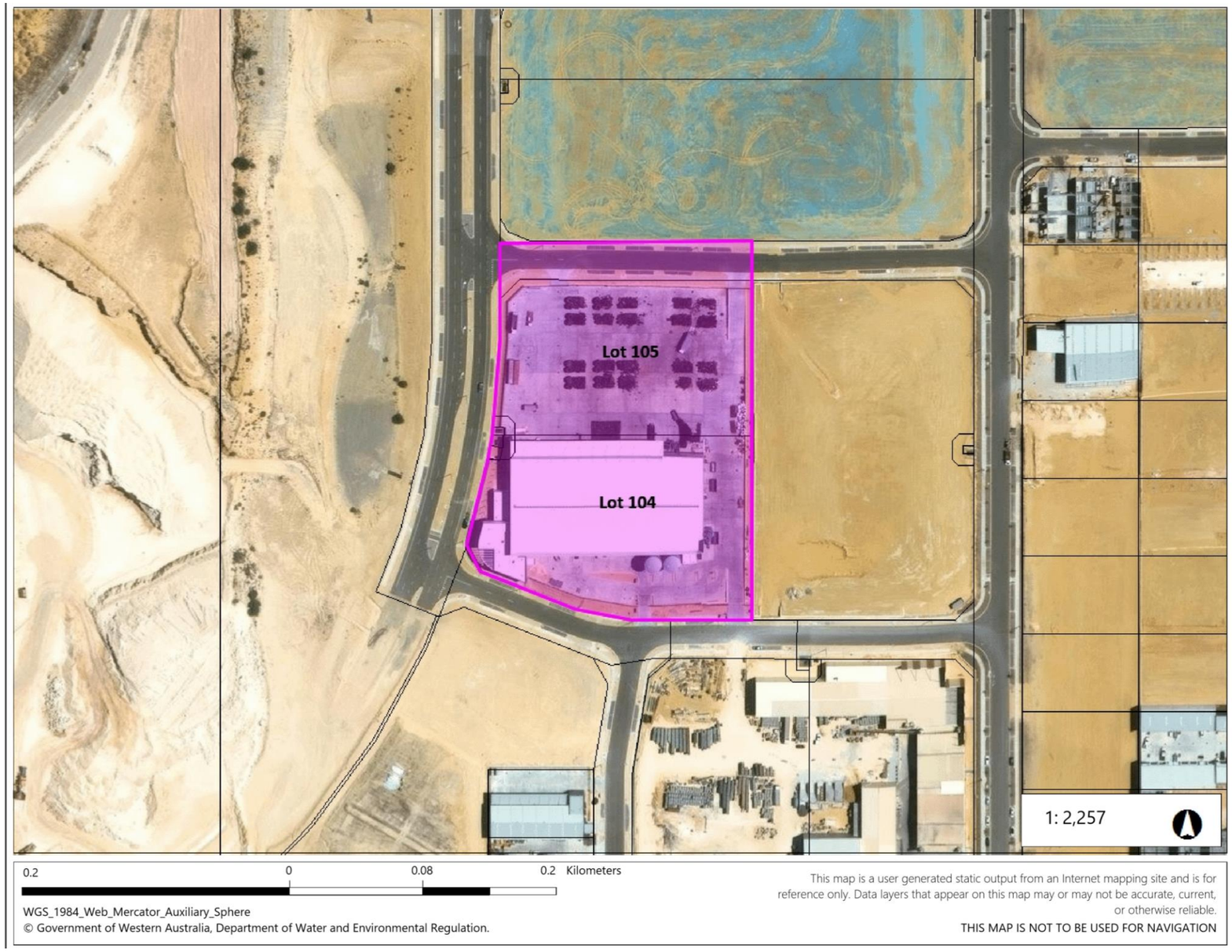

Figure 1: Map of the boundary of the prescribed premises

Warehouse infrastructure and tyre storage locations

The warehouse infrastructure layout, air emission monitoring point and internal tyre crumb storage location is shown in the map below – Lot 105 (Figure 2).

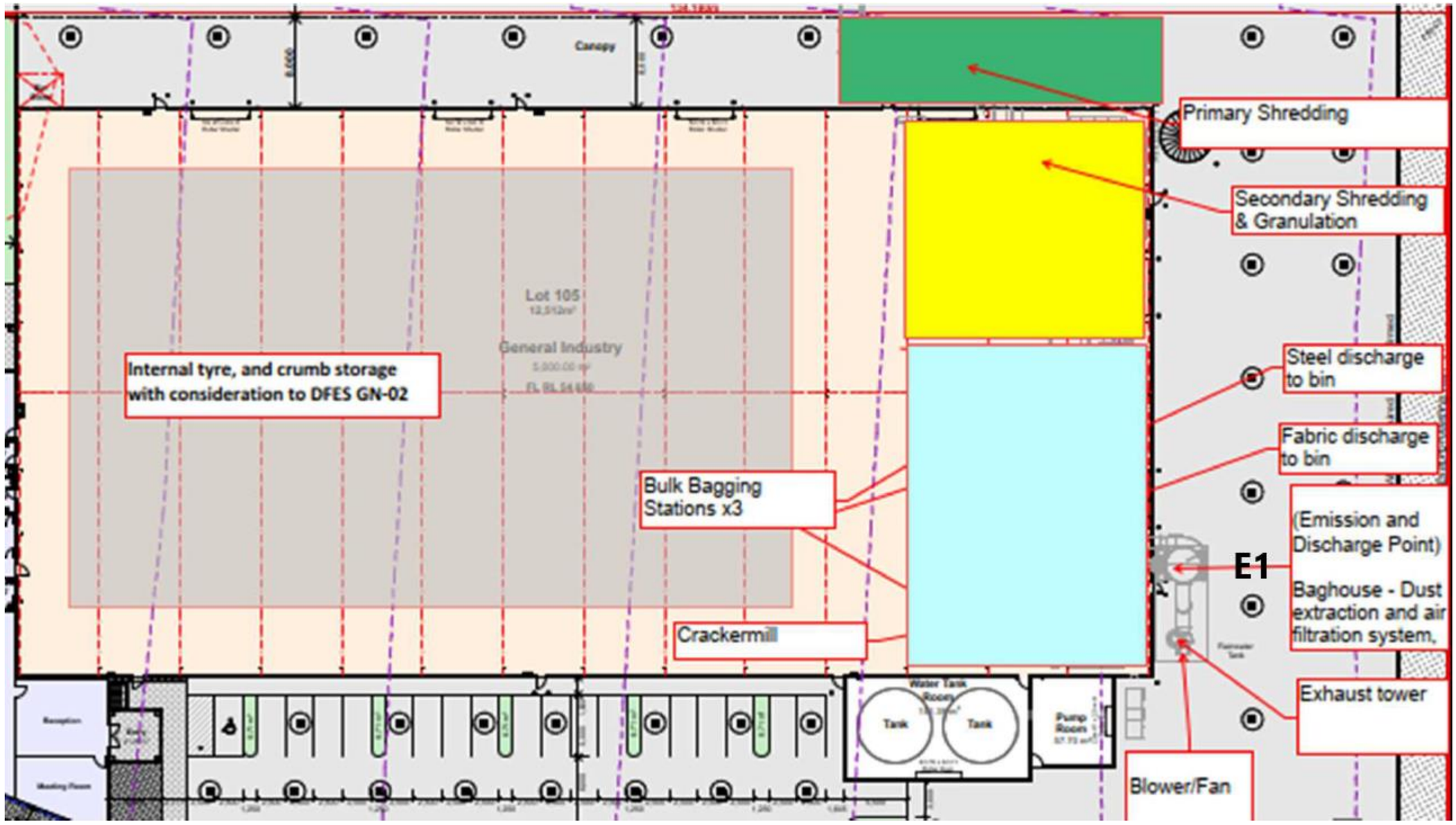

Figure 2: Map of the warehouse infrastructure layout, air emission monitoring point and internal tyre crumb storage location

External waste storage area

The proposed external waste tyre storage area is shown in the map below – Lot 104 (Figure 3).

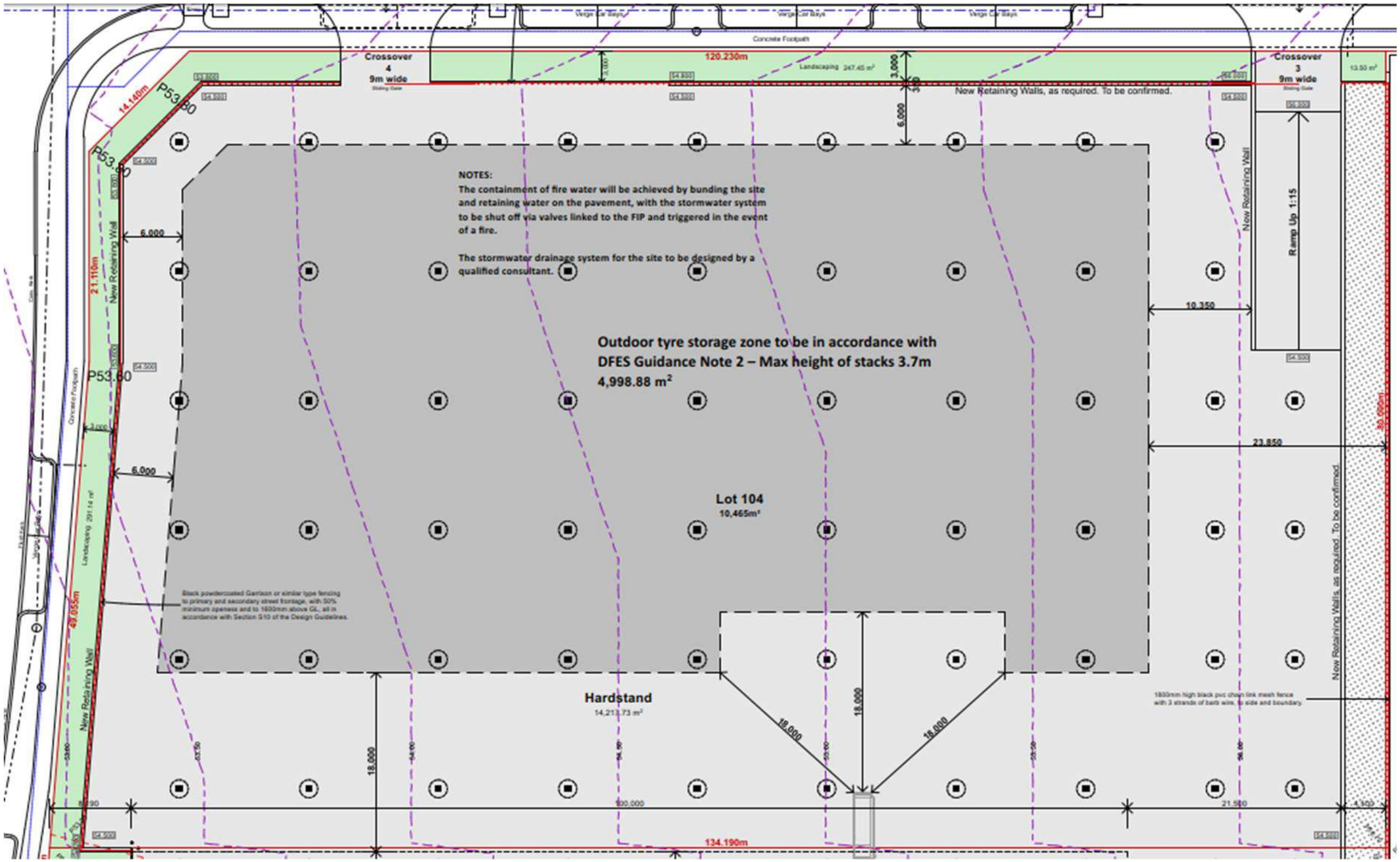

Figure 3: Map of the external tyre storage area

Stormwater drainage and firewater containment area

The premises stormwater drainage and firewater containment area is shown in the site plan below – Lots 104 and 105.

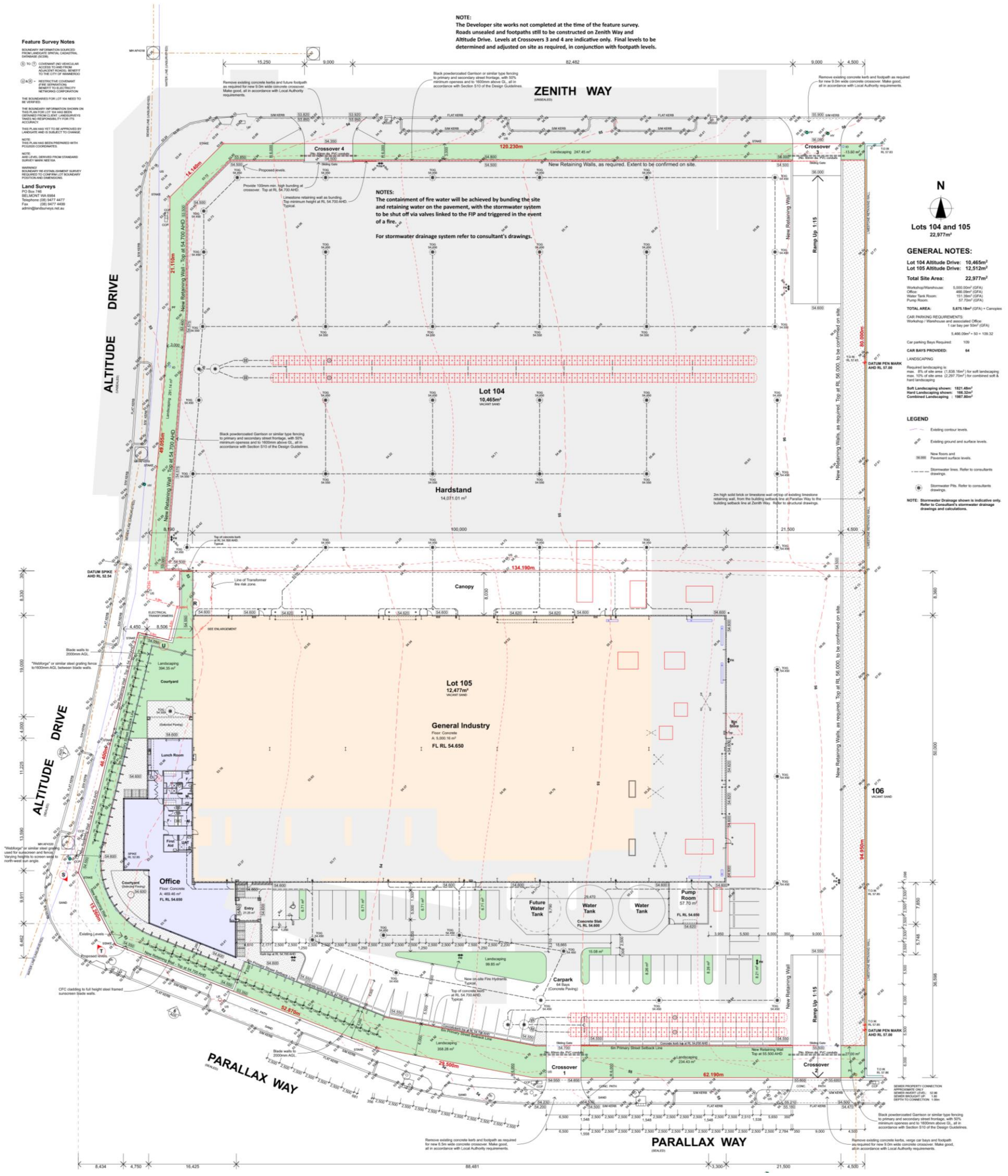

Figure 4: Site plan showing the premises stormwater drainage infrastructure

Fire equipment locations

The proposed locations of fire hydrants, hose reels and water supply lines are shown in the site plan below (Figure 5).

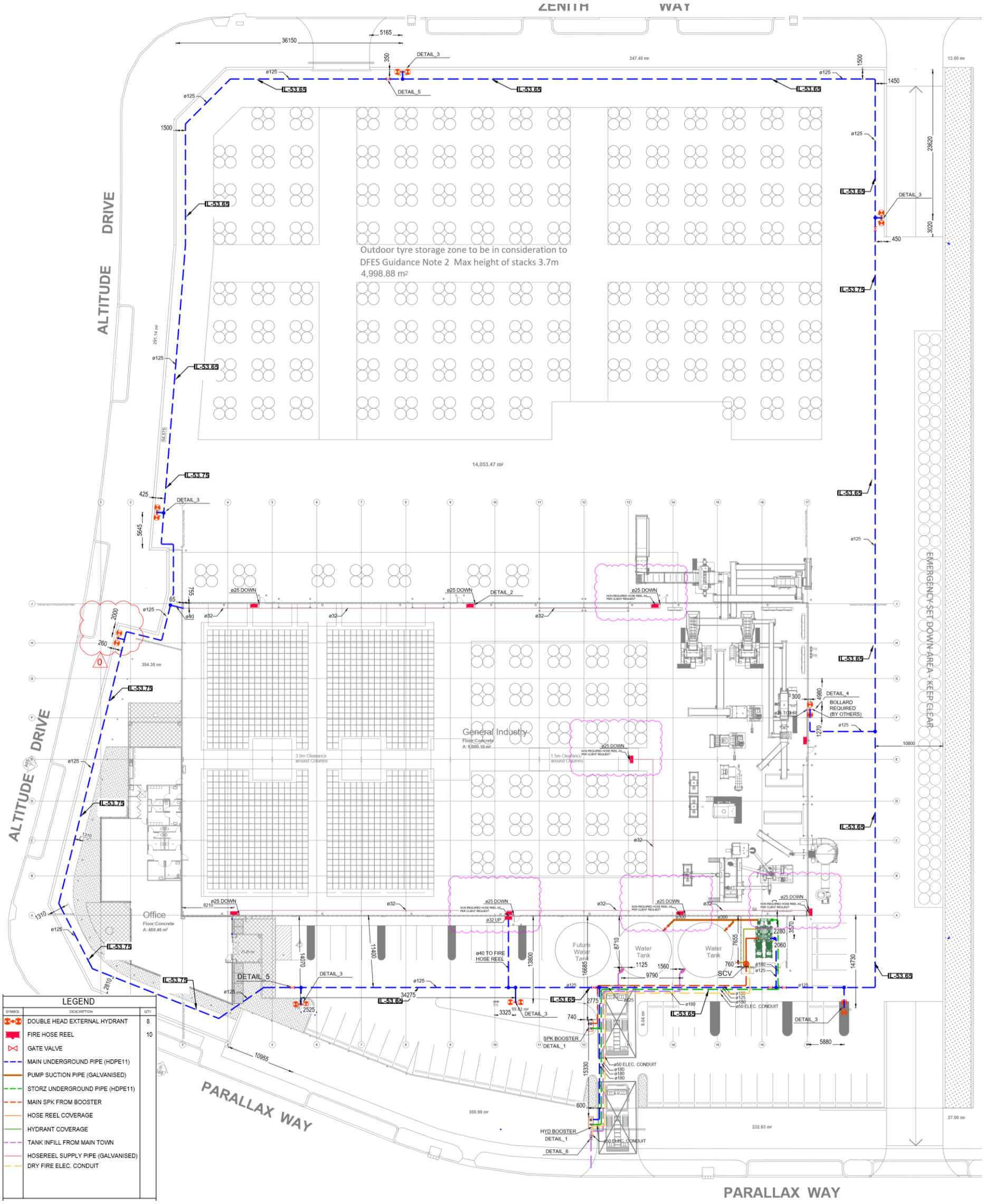

Figure 5: Map of fire hydrants, hose reels and water supply line locations

Schedule 2: Tyre storage requirements

Separation distances between four individual stacks in a group (a pile) are shown below.

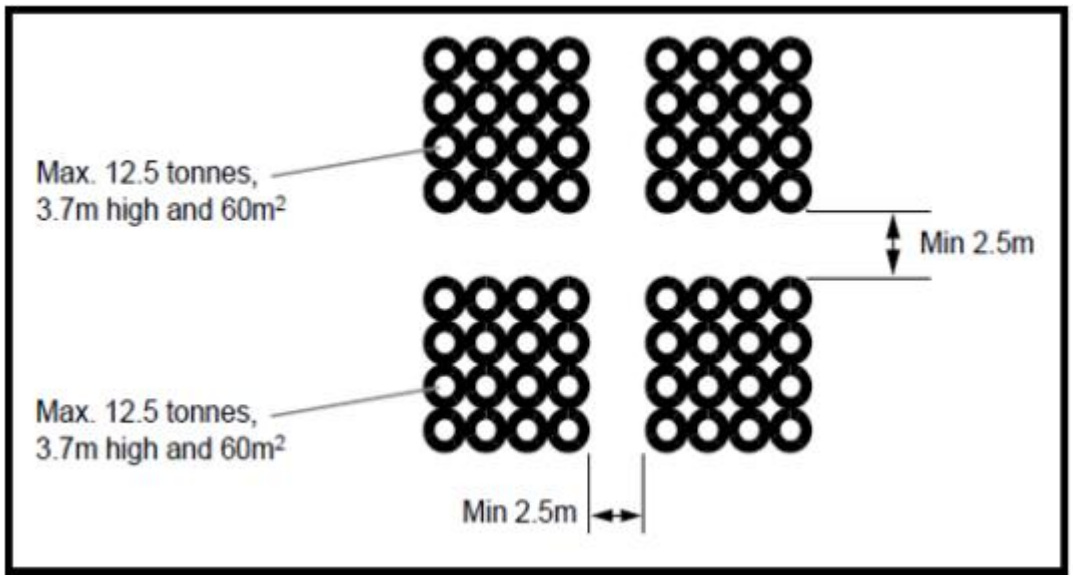

Figure 6: External storage separation distances for each four-pile of tyres

Separation distances between each pile of tyres are show below.

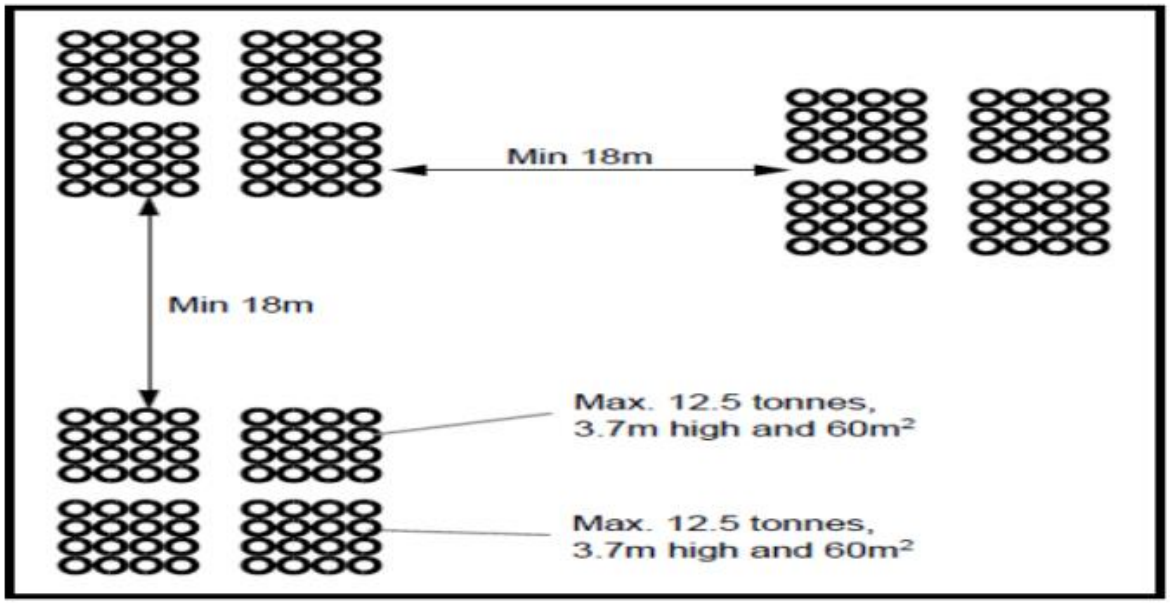

Figure 7: Minimum separation distances between piles for external storage