



Licence number	L2956/2025/1
Licence holder	Ecocycle Pty Ltd
ACN	146 190 516
Registered business address	Unit 3, 81-85 Heatherdale Road, RINGWOOD, VICTORIA 3134
DWER file number	DER2017/001541 APP-0027515
Duration	16/10/2025 to 15/10/2037
Date of issue	16/10/2025
Premises details	Kwinana Mercury Treatment Plant Lot 101 Donaldson Rd, KWINANA BEACH, WA 6167 Legal description - Part of Lot 101 on Plan 73740 As defined by the coordinates in the premises map in Schedule 1: Maps

Prescribed premises category description (Schedule 1, <i>Environmental Protection Regulations 1987</i>)	Assessed production capacity
Category 61: Liquid waste facility: premises on which liquid waste produced on other premises (other than sewerage waste) is stored, reprocessed, treated or irrigated	100 tonnes per annual period
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.	2,000 tonnes per annual period

This licence is granted to the licence holder, subject to the attached conditions, on 16 October 2025, by:

Manager, Process Industries

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

Licence history

Date	Reference number	Summary of changes
16/10/2025	L2956/2025/1	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 operational requirements

Item	Site infrastructure and equipment	Operational requirement	Infrastructure location
1	Warehouse building	a) No more than 500 tonnes of mercury-containing liquid waste (MCW) shall be stored within the building. b) Handling of MCW outside of sealed containers is not permitted within the Warehouse building. c) External doors must be kept closed except when personnel are entering or exiting the building, or waste transfer is occurring between the warehouse and a transport vehicle. d) The building sealed bunded floor must be maintained so it is impermeable to mercury and hydrocarbons, free of liquid and obstructions to maintain a capacity of at least 35 m3 of liquid, and to drain to a collection sump. e) The collection sump must be maintained, free of liquids and obstructions to permit full capacity. f) The building must be surrounded by secure fencing with lockable gates.	Location labelled "Warehouse" as shown in the Premises map Figure 1 in Schedule 1 (Maps)
2	Warehouse loading/ unloading bay	a) Aprons are maintained and debris free to enable runoff to be directed to a collection sump. b) The collection sump must be maintained free of liquids and obstructions to permit full capacity. c) Roller doors used to access the warehouse must remain closed where possible during processing of waste which must only occur during operational hours. Operational hours are defined as Monday to Friday. 7am to 4pm.	
3	Pallet scales	a) Must be capable of accurately weighing all incoming and outgoing waste. b) The measuring device must be maintained and calibrated in	N/A

Item	Site infrastructure and equipment	Operational requirement	Infrastructure location
		accordance with manufacturers' specifications.	
4	Horizontal Baler	a) Must be maintained in accordance with manufacturers' specifications.	Location labelled "Warehouse" as shown in the Premises map Figure 1 in Schedule 1 (Maps)
5	Process Building	a) Negative atmospheric pressure must be maintained through operation of the HVAC system whenever handling of MCW outside of sealed containers occurs. b) Emissions to air must only be released from the Process Building via the Emissions Stack. c) MCW waste must not be stored within the Process Building for more than 24 hours. d) The building must be kept free of combustible and flammable materials. e) The building sealed bunded floor must be maintained so it is impermeable to mercury and hydrocarbons, free of liquid and obstructions to maintain a capacity of at least 3.5 m ³ of liquid, and to drain to a collection sump. f) The collection sump must be maintained free of liquids and obstructions to permit full capacity. g) The building must be surrounded by secure fencing with lockable gates. h) Roller doors used to access the warehouse must remain closed where possible during processing of waste. i) Solid mercury-containing waste processing must only occur during the hours 7am to 4pm, Monday to Friday.	Within the location labelled "Process" as shown in the Premises map Figure 1 in Schedule 1 (Maps)
6	Emission Stack (24.9 m in height and 0.37 in diameter)	a) Stack monitoring port maintained in accordance with AS4323.1-2021. b) Ensure the stack monitoring port is calibrated and maintained according to the manufacturer's specifications and regulatory requirements.	Within the location labelled "Emission Stack" as shown in the Premises map Figure 1 in Schedule 1 (Maps)
7	HVAC System	a) Must be in operation prior to, and for the duration of all processing of solid mercury-containing waste or maintenance activities occurring within	Within the location labelled "Process" as shown in the

Item	Site infrastructure and equipment	Operational requirement	Infrastructure location
		the Process Building. b) The HVAC system must receive all exhaust emissions produced by the fluorescent lamp processor during waste processing. c) Emissions captured by the HVAC system must be filtered through panel filters before being directed to the emission stack for discharge to the environment. d) The HVAC system should be programmed to start before any other site activities commence and to shut down with a delay. e) Noise levels must not exceed 80 dB(A) measured at a distance of 1m from the HVAC fan. f) The HVAC system is maintained to receive a minimum of 2000m³ per hour	Premises map Figure 1 in Schedule 1 (Maps)
8	Onsite fire detection and response system	a) The following system components must be present, operational and maintained in accordance with the manufacturer's specifications: (i) A two-stage alarm comprising a VESDA (first stage), and a heat detection alarm (second stage) within both the Warehouse and Process Building. (ii) Heat detection alarms must activate a back-to-base alarm for automated notification to external Emergency Services. (iii) A pre-action aerosol fire suppression system in the Process Building activated by the second stage alarm. (iv) Minimum four dry powder fire extinguishers (Warehouse). (v) Minimum three dry powder fire extinguishers (Process Building).	Location labelled "Warehouse", and the location labelled "Process" as shown in the Premises map Figure 1 in Schedule 1 (Maps)
9	Liquid waste storage tanks	a) Must be maintained to prevent leaks. b) Must be surrounded by secure fencing with lockable gates. c) Bunded containment area beneath the tanks must remain free of debris and can always contain 110% of the liquid waste storage tank volume at all times.	Location labelled "Outside" as shown in the Premises map Figure 1 in Schedule 1 (Maps)

Item	Site infrastructure and equipment	Operational requirement	Infrastructure location
10	Covered waste storage area	a) The apron is maintained to allow free drainage to a collection sump. b) The collection sump must be maintained free of liquids and obstructions to permit full capacity. c) Must be surrounded by secure fencing with lockable gates.	
11	Fluorescent lamp processor	a) The cyclone and dust separator must be maintained to deliver phosphor powder directly into sealed storage bins and prevent dust leakage. b) The inbuilt activated carbon filtration system must be maintained to capture any fugitive emissions of mercury vapour or particulates released during operation. c) The crushers exhaust system must be monitored and reported for leaks. d) The connection between the exhaust and the Premises heating, ventilation and air-conditioning (HVAC) must be maintained at all times. e) The inbuilt activated carbon filter must be maintained in accordance with the manufacture's specifications. f) The inbuilt hoppers, augers and collection drums must be maintained to the manufacturer's specifications	Level 2 of the Process Plant

Waste Acceptance

- The licence holder must only accept waste of a specified waste type, not exceeding the corresponding rate, and which meets the corresponding acceptance and storage specifications as set out in Table 2.

Table 2: Types of authorised waste accepted onto the premises

	Waste type	Rate at which waste is received	Acceptance and storage specification
1	Mercury-containing liquid waste (Waste code D120)	Not exceeding 100 tonnes per annum	a) D120 waste must be received within sealed United Nations approved Dangerous Goods containers.
2	Amalgamate (Waste code T120)	Not exceeding 2,000 litres per annum	b) T120 waste must be received in sealed containers. c) D120 and T120 waste must be unloaded within the Warehouse loading/ unloading bay and transferred directly into the Warehouse for storage.

			d) Liquid waste is to be stored in sealed containers within the Warehouse Building for future transport to an offsite processing facility. e) If waste is received in damaged packaging it must be transferred into the Process Building. f) Radioactive substances (as defined by the Radiation Safety (General) Regulations 1983) must not be accepted onto the premises.
3	Fluorescent tubes and globes	Not exceeding 120 tonnes per annum	a) Fluorescent tubes and globes must be unloaded within the Warehouse loading/ unloading bay and transferred directly into the Warehouse for storage prior to transfer to the Process Building for processing.
4	E-waste	Not exceeding a combined total of 2,000 tonnes per annual period.	a) E-waste (plastic and metal) must be received at the site in steel bins b) E-waste must be unloaded within the Warehouse loading/ unloading bay and transferred directly into the Warehouse for storage.
5	Batteries including alkaline, lithium-ion, lithium metal, and acid chemistries.		a) All batteries must be unloaded within the Warehouse loading/ unloading bay and transferred directly into the Warehouse for sorting, storage, and future transport to an offsite processing facility. b) Lithium-containing batteries: (i) must be received at the site in steel bins (ii) must be stored within the Warehouse, within sealed and labeled United Nations approved galvanized steel containers. c) Other batteries (i) must be received in storage bins and collection containers (ii) stored in containers capable of containing any spilled liquids.

3. 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
4. The licence holder must ensure that wastes accepted onto the premises are only subjected to the processing methods and process limits as set out in Table 3

Table 3: Processing of waste accepted onto the premises

	Waste type	Processing method	Process limits
1	Liquid mercury containing waste (Waste code D120)	a) No treatment permitted under this licence. b) Handling of liquid waste outside of sealed containers is only permitted within the Process Building.	Not exceeding 100 tonnes per annual period
2	Amalgamate (Waste code T120)		Not exceeding 2,000 litres per annual period
3	Fluorescent lighting waste	a) Must only be processed using a fluorescent lamp recycler to crush and separate glass, phosphor powder, and metal and plastic components; b) Phosphor powder is separated by a cyclone and dust separator; and c) The phosphor powder is collected and stored in sealed steel bins for further off-site processing.	Not exceeding 120 tonnes per annual period
4	E-waste	a) Sorted by hand into categories for storage prior to redistribution offsite for recycling, or b) If no imbedded batteries are present, the Premises baler may be used to compact the plastic and metal from e-waste and stored in the warehouse prior to redistribution offsite for recycling.	Not exceeding a combined total of 2,000 tonnes per annual period.
5	Batteries	a) Sorted by hand into categories for storage prior to redistribution offsite for recycling.	

5. The licence holder must record the total amount of waste accepted onto the premises, for each waste type listed in Table 4, in the corresponding unit, and for each corresponding time period, as set out in Table 4.

Table 4: Waste accepted onto the premises

Waste type	Units	Time period
Amalgamate (Waste code T120)	litres	Each monthly period
Liquid mercury containing waste (Waste code D120)	tonnes	
Fluorescent tubes and globes		
E-waste		

Batteries (alkaline, lithium-ion, lithium metal, acid)	tonnes of each type of battery chemistry	
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Waste Disposal

6. The licence holder must record the total amount of waste removed from the premises, for each waste type listed in Table 5, in the corresponding unit, and for each corresponding time period set out in Table 5.

Table 5: Waste removed from the premises

	Waste type	Unit	Time period
1	a) Amalgamate (Waste code T120)	litres	Each load removed or rejected from the premises
2	a) Liquid mercury containing waste (Waste code D120)	tonnes	
3	a) E-waste		
4	a) Phosphor powder generated from processing fluorescent tubes and globes b) combined total of all other fluorescent tubes and globes waste		
5	a) Batteries (alkaline, lithium-ion, lithium metal, acid)	tonnes of each type of battery chemistry	

7. The licence holder must ensure that wastes received at the premises and produced at the premises as specified in Tables 2 and 5 are removed from the premises within 12 months of being received/generated.

Air Emissions

8. The licence holder must ensure that the emissions specified in Table 6, are discharged only from the corresponding discharge point and only at the corresponding discharge point location.

Table 6: Authorised discharge points

Emission	Discharge point	Discharge point location
Mercury-containing air emissions	Emission stack	As shown in Schedule 1: Maps Premises Map

9. The licence holder must ensure that emissions from the discharge point listed in Table 7 for the corresponding parameter do not exceed the corresponding limit.

Table 7: Emission and discharge limits

Discharge point	Parameter	Limit
Emission stack	Mercury	5 g/m ³

Monitoring

10. The licence holder must monitor emissions in accordance with the requirements set out in Table 8.

Table 8: Emissions and discharge monitoring

Discharge point	Monitoring location	Parameter	Frequency	Averaging period	Unit ^{1,2}	Method
Emission stack	SP-01	Mercury	Monthly during periods of discharge	120 minutes	mg/m ³	USEPA Method 29
		Volumetric Flow rate		30 minutes	m ³ /s	USEPA Method 2

Note 1: All units are referenced to STP dry.

Note 2: Concentration units for all gases are referenced to 11% O₂.

11. The licence holder must ensure that sampling required by condition 10 is undertaken at sampling locations in accordance with the current version of AS4323.1-2021.
12. The licence holder must ensure that all non-continuous sampling and analysis undertaken required by condition 10 is undertaken by a holder of NATA accreditation for the relevant methods of sampling and analysis.
13. The licence holder must record the results of all monitoring activity required by condition 10.
14. The licence holder must, within 7 days of becoming aware of any non-compliance with an emission limit specified in condition 9 of this licence, notify the CEO in writing of that non-compliance and include in that notification the following information:
- the emission limit that was not complied with;
 - the time and date when the non-compliance occurred;
 - if any environmental impact occurred as a result of the non-compliance and if so, what that impact is and where the impact occurred;
 - the details and result of any investigation undertaken into the cause of the non-compliance;
 - what action has been taken and the date on which it was taken to prevent the non-compliance occurring again; and
 - what action will be taken and the date by which it will be taken to prevent the non-compliance occurring again.

Records and reporting

Records

15. 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:
- the name and contact details of the complainant, (if provided);
 - the time and date of the complaint;

- (c) the complete details of the complaint and any other concerns or other issues raised; and
 - (d) the complete details and dates of any action taken by the licence holder to investigate or respond to any complaint.
- 16. 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) the works conducted in accordance with condition 1 of this licence;
 - (c) any maintenance of infrastructure that is performed in the course of complying with condition 1 of this licence;
 - (d) monitoring programmes undertaken in accordance with condition 10 of this licence; and
 - (e) complaints received under condition 15 of this licence.
- 17. The books specified under condition 16 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

- 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 31 December each year.
- 19. The licence holder must:
 - (a) prepare an Environmental Report that provides information in accordance with Table 9 for the preceding two annual periods, and
 - (b) submit that Environmental Report to the CEO by 31 December 2026 and biennially thereafter.

Table 9: Environmental reporting requirements

Condition	Requirement
-	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.
Table 7: Emission	Emission monitoring results against licence limits expressed as a

Condition	Requirement
limits	table.
Table 8: Emission limits	(i) Emission monitoring results summarised in a table. (ii) Provide all laboratory documents.
Condition 15	Summary of any complaints
Condition 18	Summary of compliance

Definitions

In this licence, the terms in Table 10 have the meanings defined.

Table 10: Definitions

Term	Definition
AS4323.1-2021	means the Australian Standard Stationary source emissions - Selection of sampling positions and measurement of velocity in stacks (Standards Australia, 2021 and amended 2024)
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	a 12-month period commencing from 1 October until 30 September each year.
biennially	means every two years.
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 <i>Environmental Protection Act 1986</i> Locked Bag 10 Joondalup DC WA 6919 or: info@dwer.wa.gov.au
department; DWER	means the department established under section 35 of the <i>Public Sector Management Act 1994</i> (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.

Term	Definition
emission	has the same meaning given to that term under the EP Act.
EP Act	<i>Environmental Protection Act 1986 (WA)</i>
EP Regulations	<i>Environmental Protection Regulations 1987 (WA)</i>
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.
MCW	Mercury-containing liquid waste
monthly period	means a one-month period commencing from the second day of a month until the first day of the immediately following month.
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.
Solid mercury-containing waste	Mercury-containing phosphor powder.
STP dry	means standard temperature and pressure (0°Celsius and 101.3 kilopascals) dry
USEPA	means United States (of America) Environmental Protection Agency
USEPA Method 2	means United States Environmental Protection Authority Method 2 – Determination of Stack Gas Velocity and Volumetric Flow Rate (Type S Pitot Tube)
USEPA Method 29	means United States Environmental Protection Authority Method 29 – Metal Emissions from Stationary Sources.
waste	has the same meaning given to that term under the EP Act.

END OF CONDITIONS

Schedule 1: Maps

Premises map

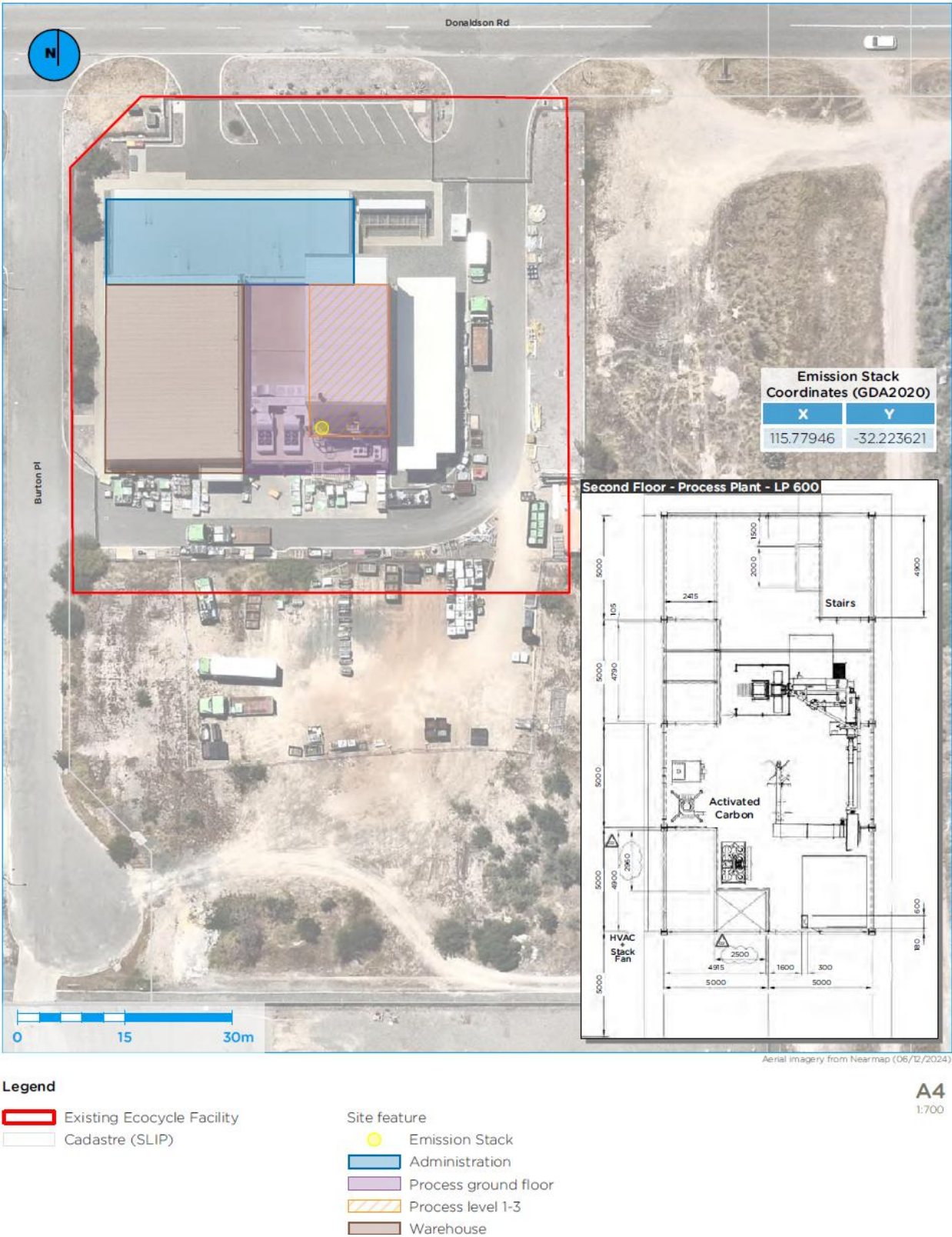


Figure 1: Map of the boundary of the prescribed premises

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