



Application for Licence

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

Licence Number	L3032/2025/1
Applicant	Complete Tyre Solutions Tyre Recycling Pty Ltd
ACN	644 200 528
File number	APP-0029379
Premises	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 As defined by the premises map attached to the issued licence
Date of report	9 October 2025
Decision	Licence granted

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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 L3032/2025/1 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 Application summary and overview of premises

On 5 June 2025, the applicant submitted an application for a licence to the department under section 57 of the *Environmental Protection Act 1986* (EP Act).

This application is seeking a licence to permit the continued operation of a Category 57 used tyre storage facility and a Category 61A solid waste facility at the premises, which were constructed and operated in accordance with works approval W6848/2023/1. The facility includes storage of up to 250,000 end-of-life tyres with infrastructure to process (shred) and recycle 30,000 tonnes of waste tyres per annum. End products include rubber crumb, tyre derived fuel (shred) and waste steel.

A works approval amendment was granted 29 May 2025, extending time-limited operations to 31 August 2025 to allow for the submission and assessment of this licence application, which seeks to authorise ongoing operations at the premises. The applicant has also submitted a works approval amendment for the installation and operation of additional infrastructure and equipment. This is being assessed separately (application reference APP-0026579).

The premises relates to the categories and assessed production / design capacity under Schedule 1 of the Environmental Protection Regulations 1987 (EP Regulations) which are defined in licence L3032/2025/1. The infrastructure and equipment relating to the premises category and any associated activities which the department has considered in line with *Guideline: Risk Assessments* (DWER 2020) are outlined in licence L3032/2025/1.

2.3 Compliance with works approval W6848/2023/1

In accordance with the submission requirements of W6848/2023/1, the applicant submitted the following documents on the corresponding dates as shown in Table 1.

Table 1: Works Approval W6848/2023/1 submission items

Condition/Table	Submission requirement	Submission date	Submission notes
Conditions 2, 3 and Table 1	Environmental Compliance Report (ECR).	4 December 2024	ECR notes all infrastructure items in Table 1 of W6848/2023/1 as 'complete'.
Conditions 1 and 19	Fire and Emergency Management Plan (FEMP).	15 May 2025	Submission received.

Condition/Table	Submission requirement	Submission date	Submission notes
Condition 2, Table 1	Updated ECR.	31 May 2025	ECR notes that the following items may not be complete: <ul style="list-style-type: none"> Item 1c - perimeter vehicular access clearance markings Item 3b – connection to direct fire brigade alarm system Item 5a – surface water drainage system containment Item 5b – Contaminated water isolation valves installation
Condition 14	A summary of inputs and outputs monitoring data.		Submission received.
Conditions 15 - 18	Noise monitoring report.		Report notes that the noise barrier wall required by Condition 2, Table 1, 1d has not been completed.
Condition 20	Summary of complaints received during time-limited operations.		Submission received.
Conditions 23 and 24	Time-limited operations report (including air emissions report).		Submission received.
Condition 2, Table 1, 5b	Contaminated water isolation valves installation confirmation.	31 July 2025	Photographs submitted showing completed installation.
Condition 2, Table 1, 5a	Surface water drainage system containment capacity confirmation.	4 August 2025	Calculations and confirmation from hydraulic services consultants received demonstrating contaminated water containment volumes.
Condition 2, Table 1, 3b	Connection confirmation received for direct brigade alarm	4 September 2025	Confirmation received noting completion.
Condition 2, Table 1, 1d	Noise barrier wall completion confirmation.		Photographs submitted showing completion.

Given the above, the department has determined that the submission requirements of W6848/2023/1 have now been met.

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 decision report are detailed in Table 2 below. Table 2 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
Operation			
Noise and vibration	Receival and unloading of used tyres Operation of tyre shredding equipment and machinery Vehicle movements	Air / windborne pathway	<ul style="list-style-type: none"> Most processing machinery to be located within an enclosed building except for the tyre feeder and primary shredder. Applicable controls recommended in the acoustic report for compliance with the Environmental Protection (Noise) Regulations 1997 (EP Noise Regulations) to be implemented.
Dust			<ul style="list-style-type: none"> Majority of tyre processing and all of crumb storage take place in an enclosed building. Dust extraction system and baghouse operated on shredding and granulating plant and maintained as required. Regular cleaning and housekeeping.
Spills of chemicals/ hydrocarbons	Maintenance of machinery and vehicles	Direct discharge to land and subsurface seepage causing impacts to groundwater sources	<ul style="list-style-type: none"> Deployment of spill kits and booms where required.

Emission	Sources	Potential pathways	Proposed controls
Smoke and particulates	Fire incident during waste tyre processing and storage	Air / windborne pathway	<ul style="list-style-type: none"> – Tyres stored in consideration with DFES Guidance Note: GN02 Bulk Storage of Rubber Tyres. – Implementation of a fire and emergency plan for the premises. – Tyres received and stacked in accordance with approved storage plan. – External yard and access way to be kept clear for emergency service vehicle access. – Automatic smoke detection and occupant warning systems installed to AS 1670.1 – On-site fire extinguishers installed to AS 2444 and fire hose reels installed in accordance with AS 2441. – Fire hydrants installed in accordance with AS 2419.1 – Internal waste storage warehouse and belt conveyors sprinklered as per AS 2118.1. – Fire systems served by two diesel fire pumps and two associated fire water storage tanks all with the relevant DFES boosting facilities for Fire Brigade Intervention. – Fire equipment maintained in accordance with AS 1851. – Shredding machinery installed with inbuilt fire controls: <ul style="list-style-type: none"> ○ Spark detection system –a baghouse and MPR. ○ Cooling augers for crumb discharge. – Containment of fire water achieved by bunding the site and retaining water on the concrete hardstand, with the stormwater system shut off via isolation valves on the general fire alarm activation from any detection or sprinkler alarm. – Bund height installed at 150% of requirement.
Fire wash water		Overland runoff potentially causing ecosystem disturbance or impacting surface water/groundwater quality	

3.1.2 Receptors

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

Table 3 and Figure 1 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 premises boundary
-	Commercial and industrial premises	Immediately surrounding commercial and industrial premises within the Neerabup Meridian Park Estate.
A - H	Semi-rural residential premises	Approximately 9 residential premises located within 1km (south) (Figure 1).
-	Aboriginal site and heritage place – Lake Neerabup (ID: 3693)	Approximately 300m west.
	Environmental receptors	Distance from prescribed premises boundary
-	Threatened/Priority Fauna	5 species mapped within 2km.
-	One confirmed and one unconfirmed black cockatoo roost site	Located within 2km.
-	Threatened Ecological Communities (TEC) and Priority Ecological Communities (PEC)	5 species mapped within 2km. Prescribed premises located within a Priority 3 PEC buffer zone.
-	Wanneroo Groundwater Area (1)	Prescribed premises located within this RIWI Act groundwater area.
I	Neerabup Lake	Located approximately 1.5km west.
-	Lake Pinjar	Located approximately 2.8km north-east.
J	Drinking water source areas	Perth coastal and Gwelup underground water pollution control area (P3) is approximately 2km south-west. Gnangara underground water pollution control area (P1) is approximately 2.5km north-east.
-	Bushforever area (230)	Located approximately 700m west.
-	Groundwater Surface geology is Tamala Limestone, predominately calcarenite.	Groundwater mapped flowing from north-east to south-west across the prescribed premises. Depth to historical max groundwater mapped at approximately 31-32m AHD Groundwater salinity mapped at <500 TDS.

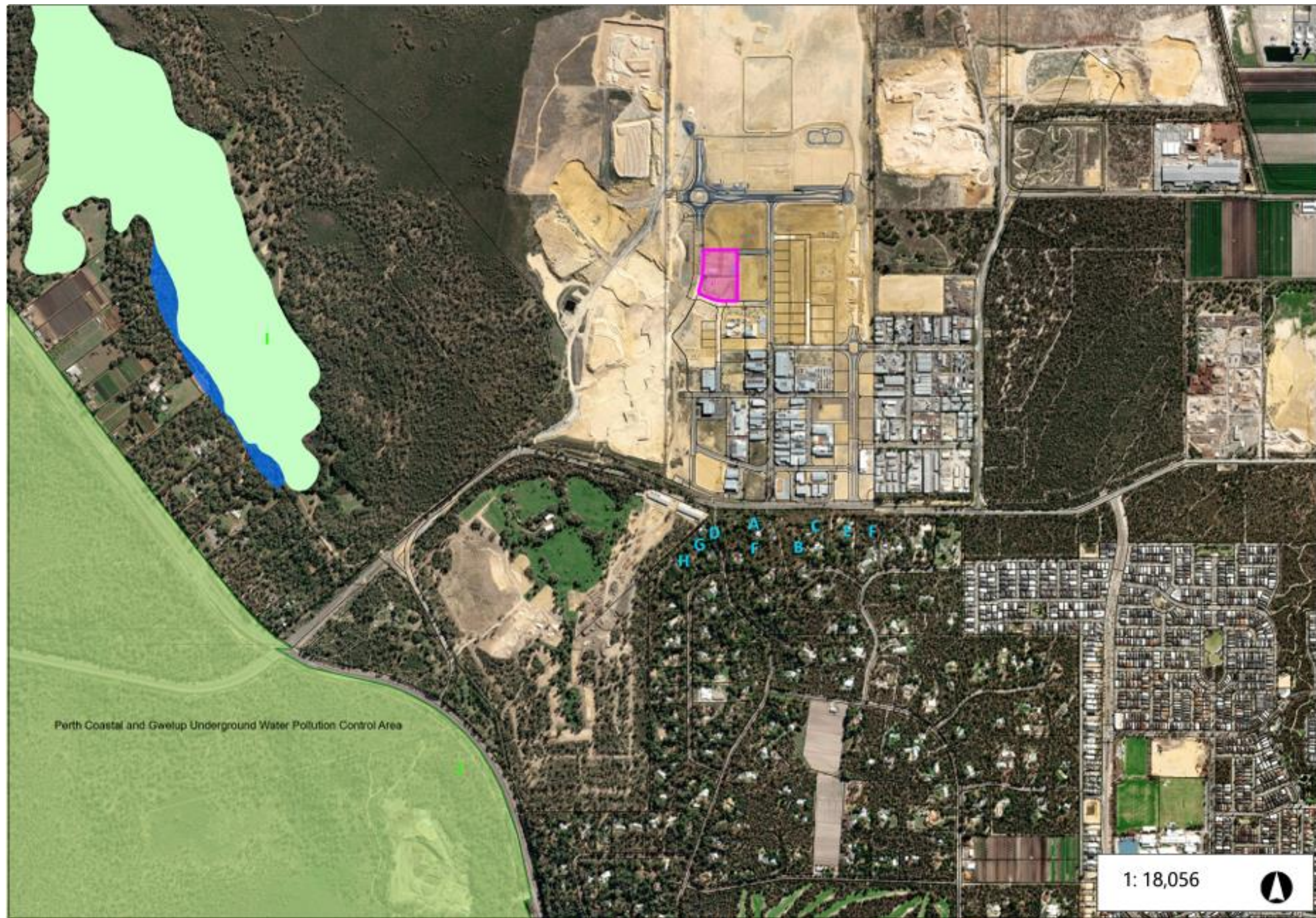


Figure 1: Distance to sensitive receptors

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for each identified emission source 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 applicant 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 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 L3032/2025/1 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 events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of licence	Justification for regulatory controls / reasoning
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
Operation								
Receival and unloading of used tyres Operation of tyre shredding equipment and machinery Vehicle movements	Noise	Air / windborne pathway causing impacts to health and amenity	Human receptors listed in Table 3	Refer to Section 3.1	C = Moderate L = Possible Medium Risk	Y	Condition 1, Table 1, 2a Condition 14	The Delegated Officer considers the controls proposed and implemented by the applicant to be adequate to prevent impacts under normal operating conditions. The provisions of the EP Noise Regulations apply. The department is currently assessing a works approval amendment for the installation of additional infrastructure at the premises which will require an updated noise assessment and verification of ongoing compliance with the EP Noise Regulations. Any official reports of unreasonable noise to the department will be investigated to ensure compliance with the EP Noise Regulations.
	Dust and air particulates		All receptors listed in Table 3		C = Moderate L = Unlikely Medium Risk	N	Condition 1, Table 1, 2b Condition 5, Table 3, a, b Condition 9, Table 4 Condition 12, Table 5	Refer to Section 3.3.
	Hydrocarbon spills from machinery and vehicles	Direct discharge to land and subsurface seepage causing impacts to groundwater sources			C = Minor L = Unlikely Low Risk	Y	Condition 1, Table 1, 1c, 2d Condition 6 Condition 7	The Delegated Officer considers that the applicant's infrastructure and management controls are likely to be sufficient at mitigating emissions from spills of hydrocarbon.
Fire incident during waste tyre / rubber crumb processing and storage	Fire, smoke and particulates	Air / windborne pathway causing impacts to health and amenity	All receptors listed in Table 3		C = Major L = Unlikely Medium Risk	Y	Condition 1, Table 1, 1a, 1b, 1d, 1e, 1f, 2c, 4a, 4b, 4c, 4d, 4e, 5a Condition 10 Condition 17	The Delegated Officer is satisfied that the applicant's infrastructure and management controls are sufficient to effectively manage the risk of impacts from fire-related emissions. The Delegated Officer has reviewed the fire and emergency management plan submitted in accordance with condition 19 of the works approval W6848/2023/1 and has determined that the provided information meets the requirements in condition 1 of works approval W6848/2023/1.
	Contaminated firefighting water and/or stormwater	Overland runoff potentially causing ecosystem disturbance or impacting surface water/groundwater quality			C = Moderate L = Unlikely Medium Risk	Y	Condition 1, Table 1, 1c, 3 Condition 8 Condition 10 Condition 17	The Delegated Officer is satisfied that the applicant's infrastructure and management controls are sufficient to effectively manage the risk of impacts from contaminated firewater and/or stormwater.

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

Note 2: Proposed applicant controls are depicted by standard text. **Bold and underline text** depicts additional regulatory controls imposed by department.

3.3 Detailed considerations - risk assessment dust emissions

Air emissions from the premises are expected to include dust from materials handling and processing, and particulate matter emissions from a stack connected to a dust extraction system and baghouse on the shredding and granulating plant.

Specifically, these emissions from premises activities are expected to include particulate matter as Total suspended particulate matter (TSP), being nuisance dust and PM¹⁰ Particulate matter with equivalent aerodynamical particle diameter of 10 µm or less. PM¹⁰ is generally considered as the (upper) threshold particle size fraction that is inhalable. The performance of the dust filtration system proposed is understood to result in maximum particulate matter emissions of 5 mg/m³.

As per the manufacturers' system standard, the applicant has constructed the stack height at 12.3m. The applicant has provided air emissions monitoring to inform the licence assessment, as required by works approval W6848/2023/1. The monitoring indicates a total particulate matter mass rate at <1g/min and total PM¹⁰ particulate matter mass rate at <3g/min, over a 60-minute period. Given the inconsistent nature of tyre processing and emissions from the stack, the Delegated Officer considers it necessary to retain stack monitoring on the licence and revise the condition to ensure quarterly monitoring is conducted during tyre processing activities.

The department is currently assessing a works approval amendment for the installation of additional infrastructure at the premises including a second baghouse and emission stack. To inform the continued assessment for dust emissions, an air emission modelling report has been requested from the applicant.

Key findings:

1. The Delegated Officer notes air emission monitoring should continue to be undertaken to validate that particulate emissions during operation of the premises remain within expected levels.
2. Ongoing air emission monitoring should be conducted during tyre processing activities.

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 on 5 August 2025 to 26 August 2025	<p>One submission received noting the compliance noise assessment lacks information to be able to verify the sites compliance with confidence.</p> <p>The report mentions compliance assessment for "operational noise emissions" however there is no detail on what machinery was running at the time. It is expected that all machinery be operational and processing during the noise measurement to assess compliance.</p>	<p>The applicant has advised that majority of the tyre recycling infrastructure was operating at the time of the noise measurements. The department considers the compliance assessment representative of operational noise emissions for the purposes of assessment.</p> <p>The department notes that the noise assessment shows compliance with the EP Noise Regulations. While measurements at the eastern boundary were close to the assigned noise level, it is acknowledged that these were taken</p>

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Consultation method	Comments received	Department response
		<p>prior to the completion of the eastern noise barrier. The applicant has since confirmed that the barrier has been constructed in accordance with the works approval, and this is expected to further reduce noise emissions to neighbouring properties.</p> <p>The department advises that anyone experiencing unreasonable noise from a premises licensed or registered under the EP Act is encouraged to submit a report to the department's Environment Watch for investigation. This can be submitted via Submit Report - Environment WAtch.</p>
Local Government Authority – City of Wanneroo advised of proposal on 5 August 2025	The City of Wanneroo responded on 24 September 2025 confirming the approved land use is consistent with the operations occurring onsite and the City has not received any complaints that have been substantiated regarding operations. The City has no objections provided that the storage of tyres complies with the DFES Guidance Note: GN02 Bulk Storage of Rubber Tyres, including shredded and crumbed tyres.	The department notes the City's response and the issued Development Approval reference: DA2022/1611 and Occupancy Permit reference: 34.2025.22.1 for this premises.
Development WA advised of proposal on 5 August 2025	No comments received.	N/A.
Applicant was provided with draft documents on 1 October 2025	The applicant responded on 6 October 2025 confirming no comments on the draft licence and decision report.	N/A.

5. Conclusion

Based on the assessment in this decision report, the Delegated Officer has determined that a licence will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

References

1. Department of Environmental Regulation (DER), July 2015. *Guidance Statement: Regulatory principles*. Perth, Western Australia. Accessed at: www.wa.gov.au
2. DER, October 2015. *Guidance Statement: Setting conditions*. Perth, Western Australia. Accessed at: www.wa.gov.au

3. DWER, June 2019. *Guideline: Decision Making*. Perth, Western Australia. Accessed at www.wa.gov.au
4. DWER, June 2019. *Guideline: Industry Regulation Guide to Licensing*. Perth, Western Australia. Accessed at www.wa.gov.au
5. DWER, December 2020, *Guideline: Environmental Siting*, Perth, Western Australia. Accessed at: www.wa.gov.au
6. DWER, December 2020, *Guideline: Risk Assessments*, Perth, Western Australia. Accessed at: www.wa.gov.au
7. Department of Fire and Emergency Services, July 2023, *Guidance Note: GN02 Bulk Storage of Rubber Tyres Including Shredded and Crumbed Tyres*. Perth, Western Australia. Accessed at: <https://publications.dfes.wa.gov.au/publications/guidance-note-gn-02-version-1-bulk-storage-of-rubber-tyres-including-shredded-and-crumbed-tyres>
8. Lloyd George Acoustics, August 2023, *Environmental Noise Assessment – Neerabup Tyre Recycling Facility Ref: 23017843-01_Rev2*. Perth, Western Australia. DWER Reference: DWERDT852913
9. DWER, October 2024, *DWER Works Approval W6848/2023/1*, Perth, Western Australia. Accessed at: W6848/2023/1
10. CTS Tyre Recycling, September 2023, *DWER Licence Application form* (and supporting documents) – *Attachment 3B – Proposed Activities*, Perth, Western Australia. DWER Reference: APP-0029379
11. Lloyd George Acoustics, May 2025, *Compliance Noise Assessment – Neerabup Tyre Recycling Facility Ref: 23017843-04*. Perth, Western Australia. DWER Reference: APP-0029379
12. Ektimo, May 2025, *Works Approval Emission Testing Report R018950*. Perth, Western Australia. DWER Reference: APP-0029379