Government of Western Australia
Department of Water and Environmental Regulation

Licence

Licence number	L8969/2016/2
Licence holder	Product Recovery Industries Pty Ltd
ACN	637 912 040
Registered business address	50 Clune Street BAYSWATER WA 6053
DWER file number	DER2016/000422-1
Duration	12/11/2021 to 02/12/2025
Date of amendment	22/09/2023
Premises details	Allday Construction Lease Area 3 190 Flynn Drive NEERABUP WA 6031 Legal description - Part of Lot 5 on Deposited Plan 91435 Certificate of Title Volume 2083 Folio 241 As defined by the coordinates in Schedule 1

Prescribed premises category description (Schedule 1, *Environmental Protection Regulations 1987*)	Assessed production / design capacity
Category 13: Crushing of building material – Premises on which waste building or demolition material (for example, bricks, stones or concrete) is crushed or cleaned	50,000 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	50,000 tonnes per annual period

This licence is granted to the licence holder, subject to the attached conditions, on 22 September 2023, by:

Marko Pasalich
Digitally signed by Marko Pasalich
Date: 2023.09.22 16:02:32 +08'00'

Marko Pasalich

A/MANAGER, WASTE INDUSTRIES

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

Licence history

Date	Reference number	Summary of changes
05/09/2016	L8969/2016/1	Licence granted.
10/10/2016	L8969/2016/1	Amendment to extend Licence duration to align with lease agreement.
12/04/2019	L8969/2016/1	DWER initiated amendment to correct the wording in licence condition 1.3.17 and update definitions.
12/05/2017	L8969/2016/1	DWER initiated amendment to extend licence duration.
26/06/2020	L8969/2016/1	Licence amendment to remove process, storage and infrastructure conditions for greenwaste, update the Premises boundary, amalgamate the licence and previous amendment notices, and update the licence to the current template.
8/10/2021	L8969/2016/2	Updated expiry date and typographic errors fixed.
22/09/203	L8969/2016/2	Transfer of Licence to Product Recovery Industries Pty Ltd.

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:

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

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

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

(h) 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:

Waste Acceptance

1. The Licence Holder must only accept onto the premises waste of a waste type, which does not exceed the corresponding rate at which waste is received, and which meets the corresponding acceptance specification set out in Table 1.

Table 1: Types of waste authorised to be accepted onto the premises

Waste type	Rate at which waste is received	Acceptance specification
Clean Fill	Combined total of 50,000 tonnes per annual period	None.
Inert Waste Type 1		Residential, Construction and Demolition (C&D) and Industrial waste only. Waste containing visible asbestos or ACM must not be accepted.
Inert Waste Type 2		Limited to plastics.
Scrap Metal		Limited to steel.

3. The Licence Holder must ensure that where waste does not meet the waste acceptance criteria set out in Condition 1 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 within 48 hours.

Asbestos management

4. The Licence Holder must ensure that any waste that does not conform to the waste acceptance criteria in Table 1 due to asbestos content, is covered or bagged and kept within a clearly identified, labelled, segregated and secure container prior to being removed off site to an appropriate authorised facility within 48 hours.

5. The Licence Holder must advise all source material providers that asbestos or potentially asbestos contaminated material is not accepted at the Premises.

6. The Licence Holder must include a ‘no asbestos’ clause in all contracts with all source material providers.

7. The Licence Holder must maintain a clearly visible sign saying ‘No Asbestos’ at the entry to the Premises.

8. The Licence Holder must visually inspect all loads of waste when they arrive at the Premises prior to unloading to determine the risk of a load containing asbestos or ACM and each load shall be classified in accordance with the risk classification procedure outlined in Attachment 1.

9. Where the inspection required by condition 7 confirms that the load does contain asbestos or ACM, the Licence Holder must:

(i) reject the waste for acceptance;

(ii) maintain accurate records of all rejected loads on the Premises and the documentation must be made available to DER officers upon request;

(iii) record the details of the waste source, material carrier, registration number of the vehicle and date of rejection.

10. The Licence Holder must direct each accepted and Classified Load to an unloading area at the site for further inspection. The unloading area shall be appropriately designed and constructed to ensure the waste will not mix with other waste.

11. The Licence Holder must dampen all Classified Loads prior to unloading and maintain the waste in a damp state throughout the inspection process using appropriate dust suppression measures.

12. The Licence Holder must inspect and maintain records for all unloaded waste in accordance with the low risk and high-risk load procedure as outlined in Attachment 2.

13. The Licence Holder must continue to visually inspect waste on the Premises at all stages of the storage, sorting and screening process. Suspect asbestos identified at any stage of the process must be handled in accordance with the high-risk load procedure outlined in Attachment 2.

14. The Licence Holder must maintain waste and processed waste on the Premises in at least two separate stockpile areas for unprocessed waste, processed waste tested for ACM and:

    (i) unprocessed waste and processed waste areas must be kept clearly separated at a minimum 3 m distance;

    (ii) processed waste tested for ACM and processed waste awaiting testing for ACM must be clearly separated by a minimum 3 m distance OR clearly delineated and separated with impermeable barriers;

    (iii) clearly visible and legible signage must be erected on individual stockpiles to clearly identify and delineate tested processed waste, untested processed waste and unprocessed waste.

15. The Licence Holder must ensure that the asbestos content of any recycled output originating from Inert Waste Type 1 does not exceed the contamination limit of 0.001% w/w for asbestos (in any form).

16. The Licence Holder must ensure that recycling outputs originating from Inert Waste Type 1 are sampled and tested in accordance with Attachment 3.

Waste Processing

17. The Licence Holder must ensure that wastes accepted onto the Premises are only subjected to the processes set out in Table 2, in accordance with any process limits described in that Table.

Table 2: Waste Processing

Waste type	Process	Process limits
Clean Fill	Acceptance, screening and storage prior to removal offsite	• No waste material to be landfilled (buried) on site • Stockpiles must not exceed 5m in height from the base of the stockpile. • All loads to be wet down prior to unloading • Crushing, screening and storage must occur on a hardstand of compacted limestone base that has a minimum thickness of 200 mm
Inert Waste Type 1	Acceptance, crushing, screening and storage prior removal offsite	

Waste type	Process	Process limits
Inert Waste Type 2	Acceptance, screening and storage prior to removal offsite	• No waste material to be landfilled (buried) on site • To be stored in a dedicated storage bin
Scrap metal	Acceptance, onsite re-use and storage prior to removal offsite	• No waste material to be landfilled (buried) on site • Offcuts and steel unable to be re-used to be stored in a dedicated storage bin

18. The Licence Holder must maintain and operate sprinklers and a water truck on all stockpiles and unsealed trafficable roads as required to suppress dust.

19. The Licence Holder must use inbuilt water spray systems on the crusher and screener at all times when the equipment is operational.

20. The Licence Holder shall restrict all vehicle movements at the Premises to 8 km/hour or less.

21. The Licence Holder shall maintain the integrity of the shade cloth installed along the boundary.

22. The Licence Holder must ensure that the crusher and screener are located in the area depicted as 'Crushing and Screening' as depicted in Figure 2 of Schedule 1.

23. The Licence Holder is limited to operating the crusher and screener between the hours of 0700 to 1700, Monday to Saturday.

24. The Licence Holder shall ensure that no waste is burnt at the Premises.

25. The Licence Holder shall collect all windblown waste from the boundary fences as required to prevent windblown waste from escaping the Premises.

Monitoring

26. The Licence Holder must undertake the monitoring in Table 3 according to the specifications in that Table.

Table 3: Monitoring of inputs and outputs

Input/Output	Parameter	Units	Frequency
Waste Inputs	Clean fill, Inert Waste Type 1	m^3	Each load arriving at the Premises
Waste Outputs	Waste type as defined in the Landfill Definitions		Each load leaving or rejected from the Premises
Processed waste	Crushed and screened products		Each load leaving the Premises

Records and reporting

27. All information and records required by the Licence must:

(a) be legible;

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

(c) except for the records listed in condition 16(d) be retained for at least 6 years from the date the records were made or until the expiry of the Licence or any subsequent Licence; and

(d) for those following records, be retained until the expiry of the Licence and any subsequent Licence:

(i) off-site environmental impacts; or

(ii) matters which effect the condition of the land or waters.

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

28. 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 by no later than 60 days after the end of that annual period an Annual Audit Compliance Report in the approved form.

29. 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; and

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

30. The licence holder must submit to the CEO by no later than 32 days after the end of each annual period, an Annual Environmental Report for that annual period for the conditions listed in Table 4, and which provides information in accordance with the corresponding requirement set out in Table 4.

Table 4: **Annual Environmental Report**

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.
14	Recycled outputs sampling and testing data.
26 Table 3	Summary of inputs and outputs monitoring data.
27	The Annual Audit Compliance Report (AACR). Form available at the DWER website: www.dwer.wa.gov.au under the publications section.
28	Complaints summary.

31. The Licence Holder must, within 7 days of becoming aware of any non-compliance with conditions of this licence, notify the CEO in writing of that non-compliance[1] and include in that notification the following information:

(a) which condition was not complied with;

(b) the time and date when the non-compliance occurred;

(c) if any environmental impact occurred as a result of the non-compliance and if so what that impact is and where the impact occurred;

(d) the details and result of any investigation undertaken into the cause of the non-compliance;

(e) what action has been taken and the date on which it was taken to prevent the non-compliance occurring again; and

(f) what action will be taken and the date by which it will be taken to prevent the non-compliance occurring again.

Note 1: Notification requirements in the Licence shall not negate the requirement to comply with s72 of the Act

Definitions

In this licence, the terms in Table 4 have the meanings defined.

Table 4: Definitions

Term	Definition
Acceptance criteria	has the meaning defined in the Landfill Definitions
ACM	means asbestos containing material
ACN	Australian Company Number
Act	means the *Environmental Protection Act 1986*
Annual Audit Compliance Report (AACR)	means a report submitted in a format approved by the CEO (relevant guidelines and templates may be available on the Department's website).
annual period	a 12 month period commencing from 1 July until 31 June of the immediately following year.
asbestos	means the asbestiform variety of mineral silicates belonging to the serpentine or amphibole groups of rock-forming minerals and includes actinolite, amosite, anthophyllite, chrysotile, crocidolite, tremolite and any mixture containing 2 or more of those
Attachment 1	Means Attachment 1 of this Licence unless otherwise stated
Attachment 2	Means Attachment 2 of this Licence unless otherwise stated
Attachment 3	Means Attachment 3 of this Licence unless otherwise stated
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
Classified Load	means the classification of waste loads during acceptance and post acceptance based on the risk of waste material containing asbestos or ACM and through visual inspection. Classification of waste loads shall be undertaken in accordance with the provisions outlined in Section 3.3 and 3.4 DER Asbestos Guidelines;
Clean fill	has the meaning defined in the Landfill Definitions
Construction and Demolition Waste	has the meaning defined in the Landfill Definitions
Controlled waste	has the meaning defined in the *Environmental Protection (Controlled Waste) Regulations 2004*
damp	means moist to the touch
Department	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.
DER Asbestos Guidelines	means document titled "Guidelines for managing asbestos at construction and demolition waste recycling facilities", published by the Department of

Term	Definition
	Environment and Conservation, as amended from time to time;
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 Regulations	*Environmental Protection Regulations 1987* (WA)
Industrial waste	means Construction and Demolition waste that has been generated from Industrial premises
Inert Waste Type 1	has the meaning defined in the Landfill Definitions
Inert Waste Type 2	has the meaning defined in the Landfill Definitions
Landfill Definitions	means the document titled "Landfill Waste Classification and Waste Definitions 1996" published by the Chief Executive Officer of the Department of Environment as amended from time to time
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.
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.
Schedule 1	means Schedule 1 of this Licence unless otherwise stated
Schedule 2	means Schedule 2 of this Licence unless otherwise stated
Usual working day	means 0800 – 1700 hours, Monday to Friday excluding public holidays in Western Australia
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 by the red line in the map below (Figure 1).

Figure 1: Map of the boundary of the prescribed premises

Premises layout

The layout of the operation area of the prescribed premises is shown in the map below (Figure 2).

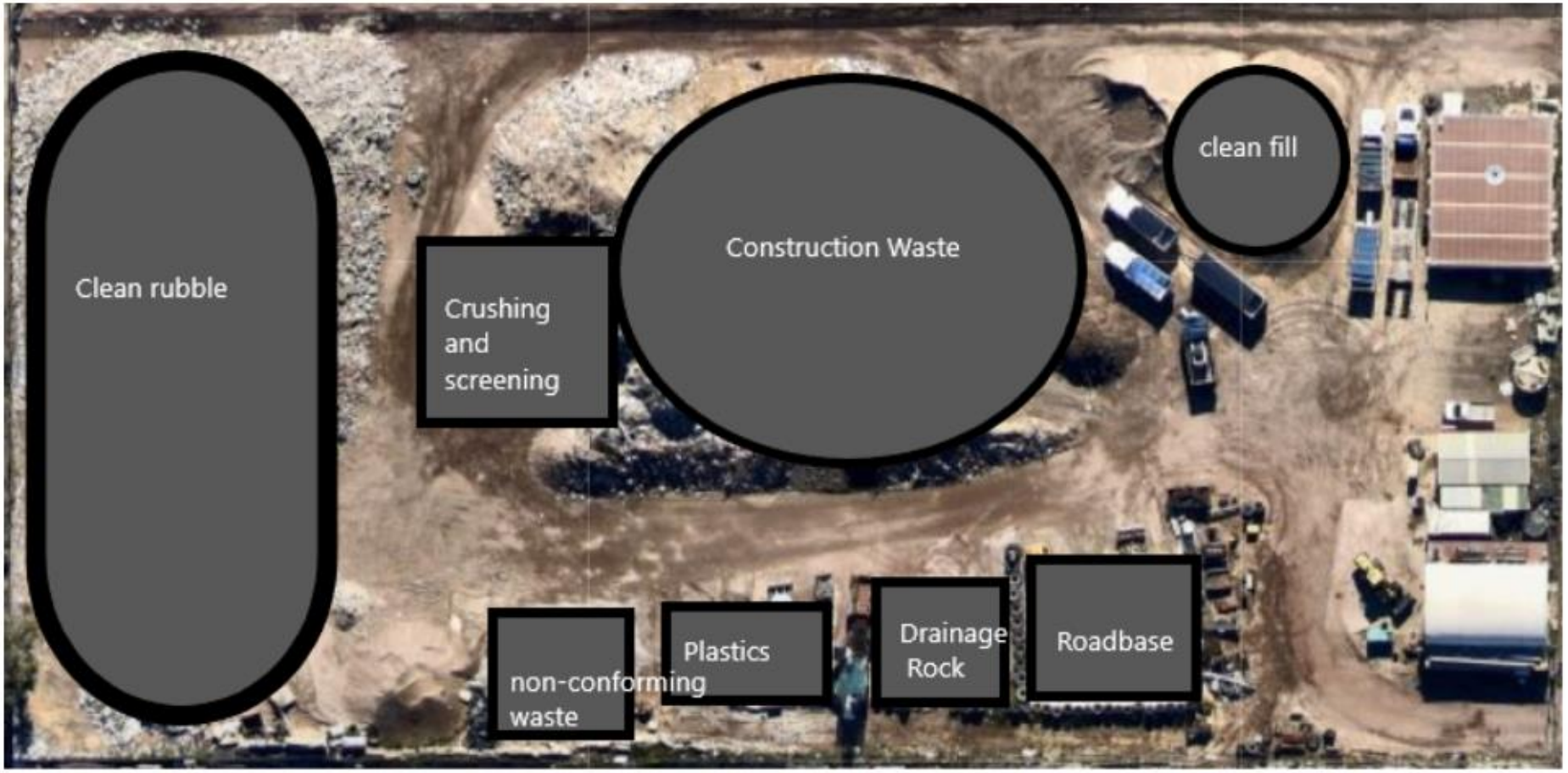

Figure 2: Premises layout

Schedule 2: Premises boundary

The premises boundary is defined by the coordinates in Table 5 and Figure 3.

Table 5: Premises boundary coordinates (GDA94)

Easting	Northing	Zone
31.68423	115.79734	50
31.68423	115.79896	
31.68355	115.79897	
31.68357	115.79733	

Figure 3: Premises coordinates

Attachment 1 - Asbestos Risk Classification Procedure

To determine the risk of an incoming load containing Asbestos, the Gatehouse operator must establish:

- The source of the load including the site location and if possible, the age of any building or structure from which the Waste originated;
- The content/Waste types within the load; and
- The type of load.

Where the source of the load can clearly be determined to be a building or structure constructed after 1990 then the load can be considered to represent a low risk of Asbestos contamination. Where the Waste originates from a building constructed before 1990 or there is uncertainty over this issue, the risks associated with Asbestos in the load must be established in line with the Risk Classification Matrix below.

Risk Classification Matrix			
	Type of load		
Material Type	**Commercial**	**Public, utes, cars and trailers***	**Skip bins**
Clean Concrete (without formwork)	Low	High	High
Clean Brick	Low	High	High
Clean Bitumen / Asphalt	Low	High	High
Mixed Construction waste	High	High	High
Mixed Demolition waste	High	High	High

* if it is possible to view the entire load of incoming C & D material (eg a small trailer with a shallow load, then consideration may be given to classifying these loads as low risk
(Risk Matrix Classification *adapted from WorkSafe Victoria 2006 and WMAA 2009*)

(Derived from Section 3.3 of the DER Asbestos Guidelines, pages 10 – 11)

Attachment 2 – High Risk Load Procedure

- High Risk Loads must be unloaded and spread over a sufficiently large area to enable a comprehensive visual inspection of all sides of the material to be undertaken.
- If Asbestos is suspected or detected, the load must be isolated, kept wet and once appropriately contained in accordance with the Environmental Protection (Controlled Waste) Regulations 2004, and redirected to an appropriately authorised disposal facility.
- Where suspect ACM is identified within a load and is not capable of being easily removed by hand, the load must be rejected and must be isolated, kept wet and once appropriately contained in accordance with the Asbestos Factsheet in Attachment 4, and redirected to an appropriately authorised disposal facility.
- Where suspected ACM fragments capable of being easily removed by hand are identified in a load, the suspect ACM must be removed from the load and either:
    1. Appropriately isolated and covered for asbestos testing. If testing of representative samples confirms the material is ACM it must be redirected to an appropriately authorised disposal facility. If testing confirms the material is not ACM the Waste can be added to the stockpile awaiting further processing; or
    2. Assumed to be ACM and redirected to an appropriately authorised disposal facility.
- All suspected or assumed ACM must be segregated. Material must be clearly labelled, kept secure and sufficiently contained to prevent the release of Asbestos including wind-blown fibres.
- Once all suspected or assumed ACM has been removed from a load in line with the above procedure, the residual Waste can be added to the stockpile waiting further processing.
- Records must be kept to ensure that the process from receipt of C&D material to the completion of the unloading procedure is auditable and that any loads found to contain suspect Asbestos will be traced back to the customer and originating site.

(Derived from Section 4.3 of the DER Asbestos Guidelines, page 12)

Attachment 3 – Asbestos Monitoring and Testing

Product testing and supply

The testing procedures detailed in this attachment have application to the three main recycled Products:

1. Recycled drainage rock 20-27mm;
2. Recycled sand, screened to <10mm; and
3. Recycled road-base, <19mm.

Stockpile inspection and sampling

- No sampling is required for recycled drainage rock, other than to determine by laboratory analysis whether a suspect fragment is Asbestos.
- For recycled road-base and screened sand, sampling is necessary and must be spread evenly over the whole stockpile surface or samples may be taken at regular intervals (as per conveyor sampling) during construction of the stockpile. Suspect ACM or areas must be targeted for sampling.
- Sampling of road base and screened sand Products must occur at a minimum rate of 40 locations per 4000 tonnes or 14 samples per 1000m^3 of Product.

Conveyor sampling

- Sampling of road base and screened sand Products must occur at a minimum rate of 1 sample per 70m^3 of a Product output. Suspect ACM or areas must be targeted for sampling.

Reduced sampling criteria

Once premises have demonstrated that their procedures are able to consistently produce recycled product that meets the product specification and undertake their activities to a high standard, DER may authorise a reduced product testing rate including down to 5 locations per 4000 tonnes (1 sample per 600m^3) of product.

Sample treatment

- Each sample collected must be at least 10 litres in volume and then be divided into 2 size fractions (>7mm and <7mm) in the field by sieving through a 7mm screen or spread out for inspection on a contrasting colour fabric. The >7mm fraction should be examined for any suspect ACM and this be retained to calculate the level of contamination.

The <7mm fraction will need to be a minimum 500 ml, be wetted, and submitted for laboratory analysis. This sample size is considered necessary to improve the limit of detection for Asbestos in the analysis procedure.

Sample analysis method

- **>7mm sample fractions –**
    - Asbestos concentrations (ACM and Asbestos) should be calculated in accordance with the methods detailed in section 4.1.7 of Department of Health (DoH), 2009, Guidelines for the Assessment, Remediation and Management of Asbestos-Contaminated Sites in Western Australia. Averaging Asbestos levels across the stockpile is not appropriate and Asbestos levels within each sample should be reported.
- **<7mm sample fractions**
    - Each <7mm sample fraction must be analysed for Asbestos and ACM.
    - Asbestos analysis must be undertaken by an independent NATA certified laboratory and comply with *Australian Standard Method for the Qualitative Identification of asbestos in bulk samples* (AS4964-2004) or be demonstrated to be able to achieve the equivalent level of results to this Australian Standard.

AS4964-2004 is currently the only method in Australia that has NATA certification; however the practicable level of detection for this standard polarized light microscopy method (PLM) and dispersion staining (DS) is 0.01%w/w. It is possible however, to measure Asbestos contamination at or lower than 0.001% w/w where an increased sample size is used, however DER recognises that any reporting of concentrations below 0.01%w/w will be outside the conditions set by NATA.

Therefore, to determine whether recycled Products meet the product specifications for Asbestos content, samples must be a minimum of 500mL in size. Proponents must adopt one of the following analytical approaches:

1. Detected/non-detected – where any quantity of Asbestos is detected by the PLM method it must be assumed, without further analysis, to be in concentrations above the product specification limit of 0.001%w/w. A weight of evidence approach may be adopted i.e. the frequency and occurrence of other positive results in the stockpile can be taken into account to determine whether the stockpile being assessed is considered to meet the product specification or not; or
2. Where any quantity of Asbestos is detected by the PLM method, the sample is subject to further testing in the form of a semi-quantitative method with a lower level of detection for Asbestos. Either of the following methods are considered acceptable by DER:
    - The extraction and weighing of fibre bundles or fibre cement material from the total sample; and
    - Measuring the width and length (i.e. volume) of individual fibre by Phase Contrast Microscopy (PCM) and calculating the weight of fibres in the extracted sub-sample.

Interpreting inspection and sampling results

- If the visual inspection, sieve sample or analytical results identify Asbestos above or possible above the 0.001%w/w criteria, then that stockpile or product process should be deemed potentially contaminated and considered for off-site disposal as Asbestos Waste, or subject to further actions to remediate it or to demonstrate its acceptability by further assessment. A record should be made of the decision-making and action taken (e.g. off-site disposal, further assessment undertaken etc.) in relation to that stockpile.
- In addition to the above, where Asbestos is identified above or possibly above the 0.001%w/w criteria, an investigation into the likely cause for the presence of Asbestos in the product should be undertaken and measures implemented to prevent a reoccurrence. A record of the investigation and its findings together with the details of any preventative measures implemented at the site should be made.

(Derived from Section 4.3 of the DER Asbestos Guidelines, pages 15 - 20)

Attachment 4 – Asbestos Factsheet

Appendix A: Asbestos Factsheet

TRANSPORTATION AND DISPOSAL OF ASBESTOS CONTAINING MATERIAL

The transportation and disposal of asbestos-containing material from commercial, industrial and other activities is regulated by the Environmental Protection (Controlled Waste) Regulations 2004 (Regulations). The Regulations apply obligations on the waste transporter to ensure the waste is safely transported to an approved location.

The Regulations define what is considered to be asbestos containing material for the purposes of the Regulations. This definition includes material which contains 0.001% or more of asbestos fibres weight/weight.

Please note that removal, handling, signage, security and onsite packaging of asbestos contaminated material must be carried out in accordance with the Local Government Authority, Department of Health and WorkSafe requirements. Contact the relevant authority for further information (refer to the end of this factsheet).

TRANSPORTATION OF ASBESTOS-CONTAINING MATERIAL (ACM)

The Regulations require asbestos containing material to be:

1. Separated from other material for disposal where that is reasonably practicable;
2. Wrapped and contained in a manner that prevents asbestos fibres entering the atmosphere during transportation on a road; and
3. Labelled or marked with the words "CAUTION ASBESTOS" in letters no less than 50 millimetres high on the individual packages and the transport container.

Further guidance on the transportation of asbestos containing materials is set out in the Code of Practice for the Safe Removal of Asbestos 2nd Edition [NOHSC:2002(2005)] and the *Health (Asbestos) Regulations (1992 or as amended)*. This Code of Practice recommends that:

- ACM is sealed in heavy duty 200 μm (minimum thickness) polythene plastic and clearly labelled with the appropriate signage warning.
- All drums or bins used to store and dispose of ACM should be in good condition, with lids and rims in good working order. The drums or bins should be lined with polythene plastic (200 μm minimum thickness) and be clearly labelled.
- If a waste skip bin, vehicle tray or similar container is used, the ACM should be double bagged before being placed in to the container or sealed in double-lined, polythene plastic (200 μm minimum thickness), and be clearly labelled. In the case of bulk loads such as contaminated soil an alternative is to double line the vehicle tray with the polythene and completely cover the load with a close fitting durable material such as the double layered polythene or a tarpaulin.