



# Licence

## *Environmental Protection Act 1986, Part V*

**LICENCE NUMBER:** L8410/2009/2

**FILE NUMBER:** DER2015/001436

### **LICENSEE AND OCCUPIER OF PREMISES**

WA Composts Pty Ltd  
Level 9, 1 William Street  
PERTH WA 6000  
ACN: 078 383 856

### **NAME AND LOCATION OF PREMISES**

C-Wise  
230 Gull Road  
NAMBEELUP WA 6207  
Being Part Lot 89 on Plan 741 bound by coordinates as depicted in Schedule 1.

### **PRESCRIBED PREMISES CATEGORY**

Schedule 1 of the *Environmental Protection Regulations 1987*

<b>CATEGORY NUMBER</b>	<b>CATEGORY DESCRIPTION</b>	<b>CATEGORY PRODUCTION OR DESIGN CAPACITY</b>	<b>PREMISES PRODUCTION OR DESIGN CAPACITY</b>
<b>67A</b>	Compost manufacturing and soil blending: premises on which organic material (excluding silage) or waste is stored pending processing, mixing, drying or composting to produce commercial quantities of compost or blended soils.	1000 tonnes or more per year	90 000 tonnes per annual period
<b>61</b>	Liquid waste facility: premises on which liquid waste produced on other premises (other than sewerage waste) is stored, reprocessed, treated, or discharged onto land.	100 tonnes or more per year	60 000 tonnes per annual period

### **CONDITIONS OF LICENCE**

Subject to the conditions of licence set out in the attached pages.

Date signed: 29 March 2016

**Caron Goodbourn**

**A/Manager Licensing – Industry Regulation (Waste Industries)**

Officer delegated under Section 20  
of the *Environmental Protection Act 1986*

**ISSUE DATE:** THURSDAY, 23 APRIL 2015  
**COMMENCEMENT DATE:** WEDNESDAY, 29 APRIL 2015  
**EXPIRY DATE:** SATURDAY, 28 OCTOBER 2017  
**AMENDMENT DATE:** TUESDAY, 29 MARCH 2016



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### DEFINITIONS

For the purposes of this Licence, unless the contrary intention appears:

‘**Act**’ means the *Environmental Protection Act 1986*;

‘**AHD**’ means Australian Height Datum;

‘**annual period**’ means the inclusive period from 1 January until 31 December in the same year;

‘**AS/NZS 5667**’ means the relevant part of Australian/New Zealand Standard 5667 and the latest version of this document;

‘**Biannual**’ with respect to monitoring or sampling under a condition of this licence means twice per year with each occasion separated by at least three calendar months;

‘**CEO**’ means Chief Executive Officer of the Department of Environment Regulation;

‘**CEO**’ for the purpose of correspondence means;

Chief Executive Officer

Department Administering the *Environmental Protection Act 1986*

Locked Bag 33

CLOISTERS SQUARE WA 6850

Email: [info@der.wa.gov.au](mailto:info@der.wa.gov.au)

‘**freeboard**’ means the distance between the maximum water surface elevations and the top of retaining banks or structures at their lowest point;

‘**green waste**’ means waste that originates from flora and which does not contain or has not been treated or coated with preserving agents, biocides, fire retardants, paint, adhesives or binders;

‘**Hardstand**’ means a surface that is impervious to liquid movement greater than 10<sup>-9</sup> meters per second;

‘**Hazardous**’ with respect to Third Party Liquid Waste for the purposes of this licence means a waste which by its characteristics is inappropriate for inclusion in the composting process because it may pose a threat or risk to public health, safety or the environment (includes substances which are toxic, infectious, mutagenic, carcinogenic, teratogenic, explosive, flammable, corrosive, oxidising and radioactive) during the composting process, it will not aid the composting process and its constituents persist into the final compost or soil product;

‘**Licence**’ means this Licence numbered L8410/2009/2 and issued under the Act;

‘**Licensee**’ means the person or organisation named as Licensee on page 1 of the Licence;

‘**mg/L**’ means milligrams per litre;

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**'NATA'** means National Association of Testing Authorities;

**'Premises'** means the area defined in the Premises Map in Schedule 1 and listed as the Premises address on page 1 of the Licence;

**'Schedule 1'** means Schedule 1 of this Licence unless otherwise stated;

**'Schedule 2'** means Schedule 2 of this Licence unless otherwise stated;

**'Schedule 3'** means Schedule 3 of this Licence unless otherwise stated;

**'Stormwater'** means rainfall that has not contacted areas used for the storage, processing, mixing of wastes and their eventual products;

**'Third Party Liquid Waste'** means liquid wastes produced on premises other than Lot 89 on Plan 741 and Lot 109 on Plan 741; and

**'Wet Mixing and Blending'** means the initial phase of the composting process where ingredients are mixed and then wet up to composting moisture levels using Third Party Liquid Wastes, piggery wash water and/or fresh water.

### GENERAL CONDITIONS

#### APPROVED PREMISES PRODUCTION CAPACITY

1. The Licensee shall not produce more than 90 000 tonnes of compost or blended soils per annual period.

#### ENVIRONMENTAL HAZARDOUS CHEMICALS

2. The Licensee shall store environmentally hazardous chemicals including, but not limited to, fuel, oil or other hydrocarbons (where the total volume of each substance stored on the premises exceeds 250 litres) within low permeability ( $10^{-9}$  metres per second or less) compound(s) designed to contain not less than 110% of the volume of the largest storage vessel or inter-connected system, and at least 25% of the total volume of vessels stored in the compound.
3. The compound(s) described in condition 2 of this Licence shall:
  - (i) be graded or include a sump to allow recovery of liquid;
  - (ii) be chemically resistant to the substances stored;
  - (iii) include valves, pumps and meters associated with transfer operations wherever practical. Otherwise the equipment shall be adequately protected (eg. bollards) and contained in an area designed to permit recovery of chemicals released following accidents or vandalism;

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- (iv) be designed such that jetting from any storage vessel or fitting will be captured within the bunded area [see for example Australian Standard 1940-2004 Section 5.9.3 (g)];
- (v) be designed such that chemicals which may react dangerously if they come into contact, are in separate bunds in the same compound or in different compounds; and
- (vi) be controlled such that the capacity of the bund is maintained at all times (eg. regular inspection and pumping of trapped uncontaminated rain water).

### **WASTE MINIMISATION / REMOVAL / STORAGE**

#### **SOLID WASTE MANAGEMENT**

- 4. The Licensee shall ensure that any Wet Mixing and Blending is contained within a Hardstand area.
- 5. Pursuant to condition 5, the Licensee shall ensure that all other activities including the storage of raw materials (other than green waste) and the storage of final product are conducted on a compacted limestone or hardstand surface.

#### **LIQUID WASTE MANAGEMENT**

- 6. The Licensee shall only accept Third Party Liquid Waste on the Premises in accordance with the controlled waste codes listed in Table 3 in Schedule 3 of this licence.
- 7. Pursuant to condition 6 of this licence, the Licensee shall not accept any Third Party Liquid Waste that is considered Hazardous.
- 8. The Licensee shall maintain a record of all Third Party Liquid Waste accepted in accordance with condition 6 of this licence and this record shall include, but not be limited to:
  - (i) the volume of the waste accepted; and
  - (ii) the controlled waste code of waste accepted.
- 9. The Licensee shall ensure that leachate and runoff generated on the Hardstand and compacted limestone areas is directed to a lined holding pond and that pooling of liquid does not occur within compacted limestone areas.
- 10. The Licensee shall ensure that any Third Party Liquid Waste accepted on the Premises is stored within lined holding ponds or directly integrated into compost ingredients.
- 11. The Licensee shall ensure that Stormwater is directed away from raw material storage, composting areas, product storage areas and liquid waste ponds at the Premises.

#### **WASTEWATER PONDS**

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12. The Licensee shall manage liquid waste ponds at the Premises so that a minimum freeboard of 300 millimetres is maintained.

### MONITORING CONDITIONS

#### MONITORING OF GROUNDWATER BORES

13. The Licensee shall collect representative water samples from the locations specified in Column 1 of Table 1 at the frequency specified in Column 2 of Table 1 and have samples analysed for the parameters specified in Column 3 of Table 1.

Table 1: C-Wise groundwater monitoring program

Column 1	Column 2	Column 3
Monitoring Locations	Monitoring Frequency	*Monitoring Parameters
Groundwater monitoring bores 1, 2, 3A, 4, 5A	Biannual	Standing water level (SWL) taken immediately prior to sampling (metres AHD)**, pH**, total dissolved solids, total inorganic nitrogen, ammonia nitrogen, nitrate nitrogen, nitrite nitrogen and total phosphorus.

\* All parameters to be measured in mg/L except SWL (measured in metres AHD) and pH (measured as pH units).

\*\* In-field non-NATA accredited analysis permitted.

14. The Licensee shall collect all water samples in accordance with the relevant parts of Australian Standard 5667.
15. The Licensee shall ensure that all samples are analysed in a laboratory with NATA accreditation for the analyses specified.

### REPORTING CONDITIONS

#### ANNUAL MONITORING REPORT

16. The Licensee shall provide to the CEO by **1 March in each year**, an Annual Monitoring Report containing data collected **during the previous annual period**. The Report shall contain but not necessarily be limited to:
- (i) the throughput in tonnes of combined compost and blended soils produced;
  - (ii) the total annual volume of each controlled waste category of Third Party Liquid Waste received at the premises in accordance with condition 6 of this Licence;
  - (iii) the results of groundwater monitoring undertaken in accordance with condition 15 of this Licence; and
  - (iv) a graphical comparison of results reported in condition 16(iii) of this Licence against all previous results obtained under condition 13 of this licence.

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### ANNUAL AUDIT COMPLIANCE REPORT

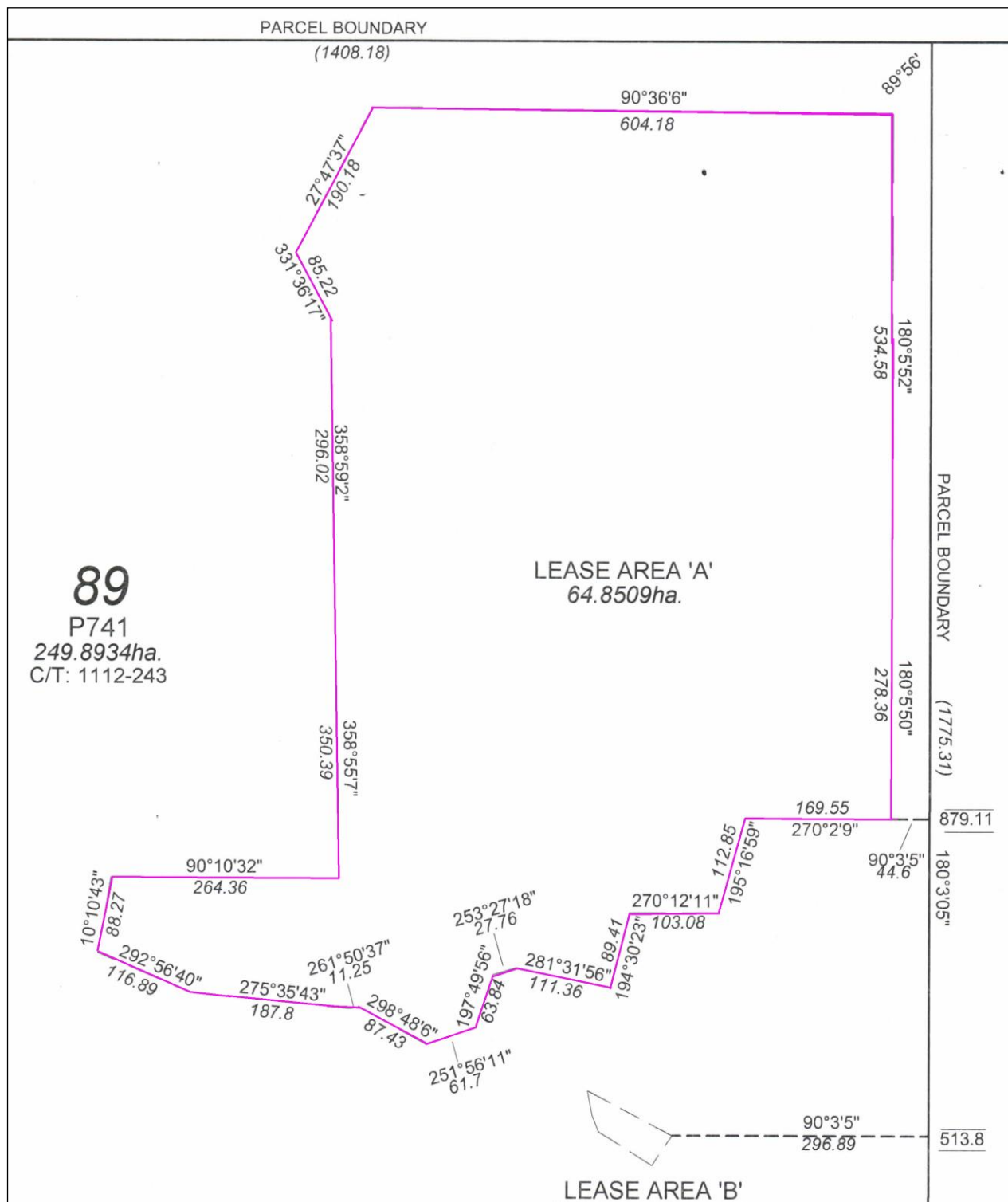
17. The Licensee shall by **1 March in each year**, provide to the CEO an annual audit compliance report in the form in Schedule 2 to this Licence, signed and certified in the manner required by Section C of the form, indicating the extent to which the Licensee has complied with the conditions of this Licence, and any previous licence issued under Part V of the Act for the Premises, **during the previous annual period**.



## Schedule 1: Maps

### Premises map

The Premises is shown in the map below. The pink line depicts the Premises boundary.



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Map of C-Wise lease area within Lot 89. The orange line depicts the Premises boundary.



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### Map of monitoring locations

The locations of the monitoring points defined in Table 1 are shown below.





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## Schedule 2: Reporting & notification forms

These forms are provided for the proponent to report monitoring and other data required by the Licence. They can be requested in an electronic format.

### ANNUAL AUDIT COMPLIANCE REPORT PROFORMA

#### SECTION A

##### LICENCE DETAILS

Licence Number:	Licence File Number:
Company Name: Trading as:	ABN:
Reporting period: _____ to _____	

##### STATEMENT OF COMPLIANCE WITH LICENCE CONDITIONS

1. Were all conditions of the Licence complied with within the reporting period? (please tick the appropriate box)

Yes ☐ Please proceed to Section C

No ☐ Please proceed to Section B

Each page must be initialled by the person(s) who signs Section C of this Annual Audit Compliance Report (AACR).

Initial:

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## SECTION B

### DETAILS OF NON-COMPLIANCE WITH LICENCE CONDITION.

Please use a separate page for each Licence condition that was not complied with.

a) Licence condition not complied with:	
b) Date(s) when the non compliance occurred, if applicable:	
c) Was this non compliance reported to DER?:	
<input type="checkbox"/> Yes <input type="checkbox"/> Reported to DER verbally Date _____ <input type="checkbox"/> Reported to DER in writing Date _____	<input type="checkbox"/> No
d) Has DER taken, or finalised any action in relation to the non compliance?:	
e) Summary of particulars of the non compliance, and what was the environmental impact:	
f) If relevant, the precise location where the non compliance occurred (attach map or diagram):	
g) Cause of non compliance:	
h) Action taken, or that will be taken to mitigate any adverse effects of the non compliance:	
i) Action taken or that will be taken to prevent recurrence of the non compliance:	

Each page must be initialled by the person(s) who signs Section C of this AACR

Initial:

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## SECTION C

### SIGNATURE AND CERTIFICATION

This Annual Audit Compliance Report (AACR) may only be signed by a person(s) with legal authority to sign it. The ways in which the AACR must be signed and certified, and the people who may sign the statement, are set out below.

Please tick the box next to the category that describes how this AACR is being signed. If you are uncertain about who is entitled to sign or which category to tick, please contact the licensing officer for your premises.

If the licence holder is		The Annual Audit Compliance Report must be signed and certified:
An individual	<input type="checkbox"/> <input type="checkbox"/>	by the individual licence holder, or by a person approved in writing by the Chief Executive Officer of the Department of Environment Regulation to sign on the licensee's behalf.
A firm or other unincorporated company	<input type="checkbox"/> <input type="checkbox"/>	by the principal executive officer of the licensee; or by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation.
A corporation	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	by affixing the common seal of the licensee in accordance with the <i>Corporations Act 2001</i> ; or by two directors of the licensee; or by a director and a company secretary of the licensee, or if the licensee is a proprietary company that has a sole director who is also the sole company secretary – by that director, or by the principal executive officer of the licensee; or by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation.
A public authority (other than a local government)	<input type="checkbox"/> <input type="checkbox"/>	by the principal executive officer of the licensee; or by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation.
a local government	<input type="checkbox"/> <input type="checkbox"/>	by the chief executive officer of the licensee; or by affixing the seal of the local government.

It is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give information on this form that to their knowledge is false or misleading in a material particular. There is a maximum penalty of \$50,000 for an individual or body corporate.

I/We declare that the information in this annual audit compliance report is correct and not false or misleading in a material particular.

SIGNATURE: \_\_\_\_\_

SIGNATURE: \_\_\_\_\_

NAME:  
(printed) \_\_\_\_\_

NAME:  
(printed) \_\_\_\_\_

POSITION: \_\_\_\_\_

POSITION: \_\_\_\_\_

DATE: \_\_\_\_/\_\_\_\_/\_\_\_\_

DATE: \_\_\_\_/\_\_\_\_/\_\_\_\_

SEAL (if signing under seal)

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## Schedule 3: Controlled waste categories

Table 3 – Controlled Waste Categories and Descriptions permitted for acceptance at the Premises.

Category Group Name	Waste Code	Description
Putrescible and Organic Wastes	K100	Animal effluent and residues
	K190	Wool scouring wastes
	K140	Tannery wastes not containing chromium
	K210	Septage wastes
	K110	Waste from grease traps
	K200	Food and beverage processing wastes
	K130	Sewage waste from the reticulated sewage system
Soils and Sludge	N150	Fly ash excluding fly ash generated from Australian coal fired power stations
	N205	Industrial waste treatment plant residues
Paints, Resins, Inks and Organic Sludge	F110	Aqueous based waste from the production, formulation and use of resins, latex, plasticisers, glues and adhesives
	F130	Solvent based waste from the production, formulation and use of resins, latex, plasticisers, glues and adhesives
	F100	Aqueous based waste from the production, formulation and use of inks, dyes, pigments, paints, lacquers and varnish
Oils	J130	Oil interceptor waste
	J120	Waste oil and water mixtures or emulsions and hydrocarbon and water mixtures or emulsions
	J180	Oil sludge
Organic Solvents	G110	Non halogenated organic solvents
	G160	Waste from production, use and formulation of organic solvents not otherwise specified
Organic Chemicals	M130	Non halogenated organic chemicals
	M250	Surfactants and detergents
Acids	B100	Acidic solutions
Alkalis	C100	Basic solutions
Inorganic Chemicals	D300	Non Toxic Salts
	D360	Phosphorous
	T120	Waste from production or formulation of photographic chemicals or processing materials
	D330	Inorganic sulphides
Industrial Wash Water	L150	Industrial waste water contaminated with a controlled waste
	L100	Car and truck wash waters
	N/A	Stormwater
	N/A	Pond water
	N140	Fire debris and wash water
Miscellaneous	N205	Industrial waste treatment plant residues



***Environmental Protection Act 1986, Part V***

**Licence: L8410/2009/2**

**Expiry date:** Saturday, 28 October 2017

Decision Document authorised by: Caron Goodbourn  
Delegated Officer



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## 1 Purpose of this Document

This decision document explains how DER has assessed and determined the application and provides a record of DER's decision-making process and how relevant factors have been taken into account. Stakeholders should note that this document is limited to DER's assessment and decision making under Part V of the *Environmental Protection Act 1986*. Other approvals may be required for the proposal, and it is the proponent's responsibility to ensure they have all relevant approvals for their Premises.

## 2 Administrative summary

Administrative details		
Application type	Works Approval <input type="checkbox"/> New Licence <input type="checkbox"/> Licence amendment <input checked="" type="checkbox"/> Works Approval amendment <input type="checkbox"/>	
Activities that cause the premises to become prescribed premises	Category number(s)	Assessed design capacity
	61 Liquid waste facility	60 000 tpa
	67A Compost manufacturing	90 000 tpa
Application verified	Date: N/A	
Application fee paid	Date: N/A	
Works Approval has been complied with Compliance Certificate received	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
Commercial-in-confidence claim	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Commercial-in-confidence claim outcome		
Is the proposal a Major Resource Project?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Was the proposal referred to the Environmental Protection Authority (EPA) under Part IV of the <i>Environmental Protection Act 1986</i> ?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Referral decision No: Managed under Part V <input type="checkbox"/>



		Assessed under Part IV <input type="checkbox"/>
Is the proposal subject to Ministerial Conditions?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Ministerial statement No: EPA Report No:
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the <i>Environmental Protection Act 1986</i> )?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Department of Water consulted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Is the Premises within an Environmental Protection Policy (EPP) Area Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <ul style="list-style-type: none"> <li><i>Environmental Protection Peel Inlet - Harvey Estuary Policy 1992</i></li> </ul>		
Is the Premises subject to any EPP requirements? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> <ul style="list-style-type: none"> <li><i>The PHE policy sets out environmental quality objectives for the estuary and infers the need for appropriate land management by landholders within the policy area. The related Statement of Planning Policy No. 2.1 (The Peel – Harvey Coastal Plain Catchment) does require that for new industrial developments involving liquid waste discharge, a sewer connection is required.</i></li> </ul>		

### 3 Executive summary

C-Wise's liquid waste and composting manufacturing facility is located in Nambeelup in the Shire of Murray, on a site known as Wandalup Farms. It is located on 64 hectares of land leased from Craig Mostyn Farms and shares the property that the leased land is located on with an intensive piggery (operated by Derby Industries Pty Ltd under L6932/1988/12) and another compost production facility for the growth of mushrooms (operated by Mushroom Exchange under L7210/1997/10).

The site is located on the Swan Coastal Plain, within the Environmental Protection (Peel Inlet-Harvey Estuary) Policy 1992 area. The Serpentine River is 2.7 km west-northwest at its nearest point. The geology is made up of predominantly Bassendean Quartz sands. Groundwater across the site and seasons varies between 0.2m and 7.6m below ground level. Rainfall on the site averages 880mm per year. There are two Environmental Protection Policy (EPP) Lakes adjacent to the boundary south east of Lot 89 and one to the south that is linked to the Wandalup site by a Resource Enhancement Wetland. The site is located in a rural zoned area and is surrounded by predominantly rural zoned land. The nearest residences are 800m to the south-east and 1200m to the south-west.

The core business of C-Wise is the production of composts and mulches from a range of organic materials and liquid wastes. Applications include horticulture, land rehabilitation, dust suppression, bioremediation, farming and landscaping. C-Wise provides a service to the neighbouring piggery by accepting wastes (such as bedding material, manure, sludges, pig mortalities) and treated wastewater from the piggery operation. C-Wises also accepts waste streams from other sources such as grease wastes, milk wastes, brewer's yeast, straw, poultry manure, green waste, paper waste and factory wash down water for reuse in the composting process.

Liquid wastes are delivered to site via controlled waste carriers and either deposited in a series of HDPE lined holding ponds pending reprocessing within compost or otherwise directly integrated into compost ingredients. For the liquids that are directly integrated into the compost ingredients, it is either absorbed into the ingredients (and processing begins within one week) or filters through, is directed back into the containment ponds and reused during the composting process. Multiple ponds form a pond treatment train which includes the processes of biofiltration, dropping out of suspended solids, aeration and biological stimulation to assist with sludge management. Composting is via both the traditional windrow method with mechanical turning and aeration of the product and/or the newer technology of mobile aerated floor (MAF) units.





C-Wise.

- holds a Groundwater Licence under *the Rights in Water Irrigation Act 1914* permitting abstraction for compost production and soil blending purposes and irrigation of up to 10 hectares of pastures;
- use the processing requirements of AS4454:2012 as guiding principles in their processes;
- completed an Odour Management Plan in 2014 and maintain a weather station on site;
- has concrete hardstand areas for the placement and processing of wet wastes;
- undertake active composting on a combination of concrete and asphalt surfaces;
- direct any leachate or contaminated stormwater back to lined holding ponds;
- use compacted limestone areas for the storage of most raw solid materials (excluding green waste) and the temporary storage of finished product.
- have five monitoring bores sampled and analysed twice per year.

This Licence is an amendment of Licence L8410/2009/2 to extend the expiry date from the 31 March 2016 to the 28 October 2017. The amendment will allow the completion of and consultation processes for a detailed licence reissue process to be finalised. It is noted that the detailed licence reissue process is underway but further time is required for the re-assessment of risks from the premises, the finalisation of DER's standard for composting facilities, and thorough consultation with the Licensee on the potentially significant licence updates.

The extension of the licence duration to 28 October 2017 is to allow align the licence with the annual fee period which it currently operates (29 October – 28 October). This licence amendment does not re-assess any risk associated with emissions from operations at the Premises.



## 4 Decision table

All applications are assessed in line with the *Environmental Protection Act 1986*, the *Environmental Protection Regulations 1987* and DER's Operational Procedure on Assessing Emissions and Discharges from Prescribed Premises. Where other references have been used in making the decision they are detailed in the decision document.

DECISION TABLE			
Works Approval / Licence section	Condition number W = Works Approval L = Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
Licence Duration	N/A	<p>The amended Licence L8410/2009/2 will be issued with an expiry date of 28 October 2017. The Licensee has previously been advised by DER that an extension of the licence expiry date into 2017 will occur.</p> <p>Instead of extending the licence by exactly 12 months (which would result in an expiry date of 31 March 2017), the licence has been extended until 28 October 2017, to align it with the time period for which annual fee payments currently aligns.</p> <p>This extension considers the factors within the document <i>Guidance statement: licence duration</i>. This will allow the completion of, and consultation referral processes for a complete licence review which undertakes a re-assessment of the environmental risk of the operations at the Premises.</p> <p>The Shire of Murray has confirmed that the duration of the planning approval for the site is indefinite. The Licensee also holds an offensive trade licence for their activities which is renewed annually in accordance with the normal offensive trade licence process.</p>	Department of Environment Regulation 2015, <i>Guidance statement: Licence duration</i>



## 5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration
22/3/2016	Proponent sent a copy of draft instrument	No comments, signed waiver form completed.	N/a



## 6 Risk Assessment

*Note: This matrix is taken from the DER Corporate Policy Statement No. 07 - Operational Risk Management*

**Table 1: Emissions Risk Matrix**

Likelihood	Consequence				
	Insignificant	Minor	Moderate	Major	Severe
Almost Certain	Moderate	High	High	Extreme	Extreme
Likely	Moderate	Moderate	High	High	Extreme
Possible	Low	Moderate	Moderate	High	Extreme
Unlikely	Low	Moderate	Moderate	Moderate	High
Rare	Low	Low	Moderate	Moderate	High