



# Licence

## *Environmental Protection Act 1986, Part V*

**Licensee:** WA Salt Koolyanobbing Pty Ltd

**Licence:** L8594/2011/1

**Registered office:** 187 Cockburn Road  
 NORTH COOGEE WA 6163

**ACN:** 009 401 558

**Premises address:** Lake Deborah Operations  
 M77/1723, L77/263 and L77/278  
 KOOLYANOBING WA 6427

**Issue date:** Thursday, 22 September 2011

**Commencement date:** Thursday, 26 September 2011

**Expiry date:** Monday, 25 September 2034

**Prescribed premises category**

Schedule 1 of the *Environmental Protection Regulations 1987*

Category number	Category description	Category production or design capacity	Premises production or design capacity
14	Solar salt manufacturing: premises on which salt is produced by solar evaporation	Not applicable	200,000 tonnes per annual period

**Conditions**

This Licence is subject to the conditions set out in the attached pages.

Date signed: 19 May 2016

.....  
**Tim Gentle**

Manager Licensing – Industry Regulation (Resources Industries)  
 Officer delegated under section 20  
 of the *Environmental Protection Act 1986*



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## Introduction

This Introduction is not part of the Licence conditions.

### DER's industry licensing role

The Department of Environment Regulation (DER) is a government department for the state of Western Australia in the portfolio of the Minister for Environment. DER's purpose is to advise on and implement strategies for a healthy environment for the benefit of all current and future Western Australians.

DER has responsibilities under Part V of the *Environmental Protection Act 1986* (the Act) for the licensing of prescribed premises. Through this process DER regulates to prevent, control and abate pollution and environmental harm to conserve and protect the environment. DER also monitors and audits compliance with works approvals and licence conditions, takes enforcement action as appropriate and develops and implements licensing and industry regulation policy.

### Licence requirements

This Licence is issued under Part V of the Act. Conditions contained within the Licence relate to the prevention, reduction or control of emissions and discharges to the environment and to the monitoring and reporting of them.

Where other statutory instruments impose obligations on the Premises/Licensee the intention is not to replicate them in the licence conditions. You should therefore ensure that you are aware of all your statutory obligations under the Act and any other statutory instrument. Legislation can be accessed through the State Law Publisher website using the following link:

<http://www.slp.wa.gov.au/legislation/statutes.nsf/default.html>

For your Premises relevant statutory instruments include but are not limited to obligations under the:

- *Environmental Protection (Unauthorised Discharges) Regulations 2004* – these Regulations make it an offence to discharge certain materials such as contaminated stormwater into the environment other than in the circumstances set out in the Regulations.
- *Environmental Protection (Controlled Waste) Regulations 2004* - these Regulations place obligations on you if you produce, accept, transport or dispose of controlled waste.
- *Environmental Protection (Noise) Regulations 1997* – these Regulations require noise emissions from the Premises to comply with the assigned noise levels set out in the Regulations.

You must comply with your licence. Non-compliance with your licence is an offence and strict penalties exist for those who do not comply.



Licence holders are also reminded of the requirements of section 53 of the Act which places restrictions on making certain changes to prescribed premises unless the changes are in accordance with a works approval, licence, closure notice or environmental protection notice.

**Licence fees**

If you have a licence that is issued for more than one year, you are required to pay an annual licence fee prior to the anniversary date of issue of your licence. Non payment of annual licence fees will result in your licence ceasing to have effect meaning that it will no longer be valid and you will need to apply for a new licence for your Premises.

**Ministerial conditions**

If your Premises has been assessed under Part IV of the Act you may have had conditions imposed by the Minister for Environment. You are required to comply with any conditions imposed by the Minister.

**Premises description and Licence summary**

WA Salt Koolyanobbing Pty Ltd (WA Salt) operates the solar salt mine at Lake Deborah, a remote site approximately 20 kilometres from Koolyanobbing. The operation is located on a headland on the lakes southern edge.

Rain falls during the winter months creating brine. Solar evaporation dries the lake sufficiently by approximately November to enable harvesting of the salt crystals. The harvest is carried out over 8 to 10 weeks. After the salt harvest is completed and salt has been stockpiled, approximately 50,000 tonnes of salt is washed each year. Brine drains from the pile out onto the lake surface from which the salt has been cut and quickly sinks into the crust. Groundwater is pumped to the wash water dam for use on the salt, removing leaf, twigs and other extraneous matter for food grade and pool salt.

Salt is loaded into the wash plant with a front end loader, and then passed through a screw washer, where extraneous matter is removed by way of overflow of water over a weir. Salt is then passed through a centrifuge that removes small sand and gypsum particles and reduces the moisture to around 2%. Salt is then stored in a washed salt stockpile before it is transported by road to WA Salt's North Coogee factory for further processing. Brine used for washing salt is pumped to a settling pond where salt is settled out and the brine reused in the washing process.

This Licence is the result of an amendment sought by the Licensee to extend the expiry in line with the DER Guidance Statement: Licence Duration, which recommends licences to be authorised for up to 20 years or until other approvals allow the site to operate. Further changes were also made to the premises description following the amalgamation of site mining leases issued by the Department of Mines and Petroleum.

The licences and works approvals issued for the Premises since 22 September 2011 are:

Instrument log		
Instrument	Issued	Description
L8594/2011/1	22/11/2011	New licence
L8594/2011/1	19/05/2016	Amendment to extend expiry and redefine premises tenements

**Severance**

It is the intent of these Licence conditions that they shall operate so that, if a condition or a part of a condition is beyond the power of this Licence to impose, or is otherwise *ultra vires* or invalid, that condition or part of a condition shall be severed and the remainder of these conditions shall nevertheless be valid to the extent that they are within the power of this Licence to impose and are not otherwise *ultra vires* or invalid.

**END OF INTRODUCTION**



## Licence conditions

### 1 General

#### 1.1 Interpretation

1.1.1 In the Licence, definitions from the *Environmental Protection Act 1986* apply unless the contrary intention appears.

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

**'Act'** means the *Environmental Protection Act 1986*;

**'annual period'** means the inclusive period from 1 February until 31 January in the following year;

**'AS/NZS 5667.1'** means the Australian Standard AS/NZS 5667.1 *Water Quality – Sampling – Guidance of the Design of sampling programs, sampling techniques and the preservation and handling of samples*;

**'AS/NZS 5667.4'** means the Australian Standard AS/NZS 5667.4 *Water Quality – Sampling – Guidance on sampling from lakes, natural and man-made*;

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

**'CEO'** for the purpose of correspondence means;

Manager - Licensing (Resource Industries)

At the following address:

Department Administering the *Environmental Protection Act 1986*

Locked Bag 33

CLOISTERS SQUARE WA 6850

Telephone: (08) 9333 7510

Facsimile: (08) 9333 7550

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

**'Licence'** means this Licence numbered L6088/1989/8 and issued under the Act;

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

**'NATA'** means the National Association of Testing Authorities, Australia;

**'NATA accredited'** means in relation to the analysis of a sample that the laboratory is NATA accredited for the specified analysis at the time of the analysis;

**'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;

**'usual working day'** means 0800 – 1700 hours, Monday to Friday excluding public holidays in Western Australia; and

**'waste'** has the meaning defined in the *Environmental Protection Act 1986*.



1.1.3 Any reference to an Australian or other standard in the Licence means the relevant parts of the standard in force from time to time during the term of this Licence.

1.1.4 Any reference to a guideline or code of practice in the Licence means the version of that guideline or code of practice in force from time to time, and shall include any amendments or replacements to that guideline or code of practice made during the term of this Licence.

**1.2 Premises operation**

1.2.1 The licensee shall contain pipelines used to transport concentrated brines within bunds to contain any leaks and discharge any leakage back into Lake Deborah.

1.2.2 The Licensee shall:

- (a) undertake inspections as detailed in Table 1.2.1;
- (b) where any inspection identifies that an appropriate level of environmental protection is not being maintained, take corrective action to mitigate adverse environmental consequences as soon as practicable; and
- (c) maintain a record of all inspections undertaken.

<b>Table 1.2.1: Inspection of infrastructure</b>		
<b>Scope of inspection</b>	<b>Type of inspection</b>	<b>Frequency of inspection<sup>1</sup></b>
Pipelines containing concentrated brines	Visual integrity	Daily
Wastewater containment systems, drain bund wall and sump	Visual integrity	Weekly

Note 1: Inspections are only required when infrastructure is in use

**2 Monitoring**

**2.1 General monitoring**

2.1.1 The licensee shall ensure that:

- (a) all water samples are collected and preserved in accordance with AS/NZS 5667.1;
- (b) all surface water sampling is conducted in accordance with AS/NZS 5667.4;
- (c) all samples are submitted to a laboratory with current NATA accreditation for the parameters to be measured.

**2.2 Ambient environmental quality monitoring**

2.2.1 The Licensee shall undertake the monitoring in Table 2.2.1 according to the specifications in that table and record and investigate results that do not meet any limit specified.

<b>Table 2.2.1: Monitoring of ambient surface water quality</b>				
<b>Monitoring point reference</b>	<b>Parameter</b>	<b>Units</b>	<b>Averaging period</b>	<b>Frequency</b>
A1, A2, A3, A4, A5 and A6	Sodium Chloride (NaCl)	mg/L	Spot sample	Biannual (June and December)
Reference Point B	Potassium (K)			
	Calcium (Ca)			
	Magnesium (Mg)			
	Total Dissolved Solids (TDS)			
	Total Suspended Solids (TSS)			



### 3 Information

#### 3.1 Records

- 3.1.1 All information and records required by the Licence shall:
- (a) be legible;
  - (b) if amended, be amended in such a way that the original and subsequent amendments remain legible or are capable of retrieval;
  - (c) except for records listed in 3.1.1(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 effects; or
    - (ii) matters which affect the condition of the land or waters.
- 3.1.2 The Licensee shall ensure that:
- (a) any person left in charge of the Premises is aware of the conditions of the Licence and has access at all times to the Licence or copies thereof; and
  - (b) any person who performs tasks on the Premises is informed of all of the conditions of the Licence that relate to the tasks which that person is performing.
- 3.1.3 The Licensee shall complete an Annual Audit Compliance Report indicating the extent to which the Licensee has complied with the conditions of the Licence, and any previous licence issued under Part V of the Act for the Premises for the previous annual period.
- 3.1.4 The Licensee shall implement a complaints management system that as a minimum records the number and details of complaints received concerning the environmental impact of the activities undertaken at the Premises and any action taken in response to the complaint.

#### 3.2 Reporting

- 3.2.1 The Licensee shall submit to the CEO an Annual Environmental Report by 1 March each year for the previous annual period. The report shall contain the information listed in Table 3.2.1 in the format or form specified in that table.

Table 3.2.1: Annual environmental report		
Condition or table (if relevant)	Parameter	Format or form <sup>1</sup>
-	Summary of any failure or malfunction of any pollution control equipment or any incidents that have occurred during the year and any action taken	None specified
2.2.1	Ambient surface water quality monitoring	
3.1.3	Compliance	AACR
3.1.4	Complaints summary	None specified
-	Annual period throughput	

Note 1: Forms are in Schedule 2

- 3.2.2 The Licensee shall ensure that the annual environmental report also contains:
- (a) an assessment of the information contained within the report against previous monitoring results and Licence limits;
  - (b) a list of any original monitoring reports submitted to the Licensee from third parties in the reporting period and make these reports available on request; and
  - (c) an assessment of the information contained within the report against appropriate standards or guidelines.



### 3.3 Notification

3.3.1 The Licensee shall ensure that the parameters listed in Table 3.3.1 are notified to the CEO in accordance with the notification requirements of the table.

<b>Table 3.3.1: Notification requirements</b>			
<b>Condition or table (if relevant)</b>	<b>Parameter</b>	<b>Notification requirement<sup>1</sup></b>	<b>Format or form<sup>2</sup></b>
2.1.1	Breach of any limit specified in the Licence	Part A: As soon as practicable but no later than 5PM of the next usual working day.  Part B: As soon as practicable	N1

Note 1: No notification requirement in the Licence shall negate the requirement to comply with s72 of the Act.

Note 2: Forms are in Schedule 2





## 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:





## 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)



Licence: L8594/2011/1  
 Form: N1

Licensee: WA Salt Koolyanobbing Pty Ltd  
 Date of breach:

**Notification of detection of the breach of a limit.**

These pages outline the information that the operator must provide.  
 Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

**Part A**

Licence Number	
Name of operator	
Location of Premises	
Time and date of the detection	

<b>Notification requirements for the breach of a limit</b>	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value	
Date and time of monitoring	
Measures taken, or intended to be taken, to stop the emission	



## Part B

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident.	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission.	
The dates of any previous N1 notifications for the Premises in the preceding 24 months.	

Name	
Post	
Signature on behalf of WA Salt Koolyanobbing Pty Ltd	
Date	



# Decision Document

## *Environmental Protection Act 1986, Part V*

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**Proponent:** **WA Salt Koolyanobbing Pty Ltd**

**Licence:** **L8594/2011/1**

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**Registered office:** 187 Cockburn Road  
NORTH COOGEE WA 6163

**ACN:** 009 401 558

**Premises address:** Lake Deborah Operations  
M77/1723, L77/263 and L77/278  
KOOLYANOBING WA 6427

**Issue date:** Thursday, 22 September 2011

**Commencement date:** Thursday, 26 September 2011

**Expiry date:** Monday, 25 September 2034

### **Decision**

Based on the assessment detailed in this document the Department of Environment Regulation (DER), has decided to issue an amended licence. DER considers that in reaching this decision, it has taken into account all relevant considerations and legal requirements and that the Licence and its conditions will ensure that an appropriate level of environmental protection is provided.

Decision Document prepared by: Clarrie Green  
Licensing Officer

Decision Document authorised by: Tim Gentle  
Delegated Officer



## Contents

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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 type="checkbox"/> Works Approval amendment <input type="checkbox"/>	
Activities that cause the premises to become prescribed premises	<b>Category number(s)</b>	<b>Assessed design capacity</b>
	14	200,000 tonnes per annual period
Application verified	Date:	
Application fee paid	Date:	
Works Approval has been complied with	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
Compliance Certificate received	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
Commercial-in-confidence claim	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Commercial-in-confidence claim outcome		
Is the proposal a Major Resource Project?	Yes <input type="checkbox"/> No <input 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 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 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 type="checkbox"/>	Department of Water consulted Yes <input type="checkbox"/> No <input type="checkbox"/>
Is the Premises within an Environmental Protection Policy (EPP) Area Yes <input type="checkbox"/> No <input type="checkbox"/> If Yes include details of which EPP(s) here.		
Is the Premises subject to any EPP requirements? Yes <input type="checkbox"/> No <input type="checkbox"/> If Yes, include details here, eg Site is subject to SO <sub>2</sub> requirements of Kwinana EPP.		

### 3 Executive summary of proposal and assessment

WA Salt Koolyanobbing Pty Ltd (WA Salt) operates the solar salt mine at Lake Deborah, a remote site approximately 20 kilometres from Koolyanobbing. The operation is located on a headland on the lakes southern edge.

This Licence is the result of an amendment sought by the Licensee to extend the expiry in line with the DER Guidance Statement: Licence Duration, which recommends licences to be authorised for up to 20 years or until other approvals allow the site to operate. Further changes were also made to the premises description following the amalgamation of site mining leases issued by the Department of Mines and Petroleum. In amending the Licence DER also converted it into the current format.

DER has considered whether the risk profile of emissions and discharges from the premises has significantly changed since the previous licence was granted. No significant changes have occurred and therefore DER has not amended conditions relating to emissions and discharges.



## 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 L= Licence	Justification (including risk description & decision methodology where relevant)	Reference documents
Premises operation	L1.2.1 Former condition 1	Condition 1 of the previous licence requiring the management of saline water to prevent discharges to areas of native vegetation has been replaced by condition 1.2.1. This condition provides the same level of environmental protection and resemble requirements of WA Salt at their Pink Lake Refinery (L6088/1989/8).	<i>Environmental Protection (Unauthorised Discharges) Regulations, 2004</i>
Discharges to land including monitoring	L1.2.2 Former condition 5	Condition 5(a) has been replaced by condition 1.2.1 on the amended Licence. The reporting component of former condition 5 is replaced by WA Salt's duty to notify DER under section 72 of the <i>Environmental Protection Act 1986</i> of any discharge of waste other than in accordance with this Licence. The costean pipeline that transports saline groundwater to the wash plant is kept in bunded containment and is monitored for leaks and maintenance when in use.	General provisions of the <i>Environmental Protection Act 1986</i> .
Fugitive emissions	Former conditions 2 and 3	<p><u>Emission Description</u></p> <p><i>Emission:</i> Particulate matter from vehicle movement, feed out hopper, excavation and stockpiling of product.</p> <p><i>Impact:</i> WA Salt's operations are located within a Priority Ecological Community. Therefore the impacts of saline fugitive emissions may have moderate environmental consequences.</p> <p><i>Controls:</i> Due to the high moisture content of the Lake Deborah lakebed and the product being mined, the likelihood of dust emissions is considered very rare. Crusting on stockpiles will reduce the likelihood of fugitive emissions at storage locations while a water truck (using saline water) is available and during times of road maintenance is used to control dust and bind the road.</p>	N/A



<b>DECISION TABLE</b>			
<b>Works Approval / Licence section</b>	<b>Condition number L= Licence</b>	<b>Justification (including risk description &amp; decision methodology where relevant)</b>	<b>Reference documents</b>
		<p><u>Risk Assessment</u> <i>Consequence: Moderate</i> <i>Likelihood: Rare</i> <i>Risk Rating: Moderate</i></p> <p><u>Regulatory Controls</u> Generic fugitive emission conditions (L2.6.1 and 2.6.2) are no longer used on environmental licences as they are deemed unenforceable and not clearly defined. The environmental risk of fugitive emissions associated with salt mining at Lake Deborah is moderate to low and therefore generic fugitive dust conditions have not been replaced.</p>	
<b>Ambient environmental quality monitoring</b>	L2.1.1 – 2.2.1 Former condition 4	Condition 4 has been directly replaced by conditions 2.1.1 and 2.2.1. The measurement of density within surface water samples has not been transferred across to the amended Licence as results from consecutive Annual Environmental Reports have identified no change.	Australian Standard AS/NZS 5667.1 Water Quality Sampling
<b>Information</b>	L4.2.1 – 4.2.2 Former conditions 6 and 7	Reporting conditions have been amended to align with the current licence format. No additional reporting requirements are included within this amended Licence.	N/A
<b>Licence Duration</b>	N/A	The Licence duration has been extended to 25 September 2034 to more closely align with the expiry of mining leases held by WA Salt and current DER annual fee dates for the premises.	DER Guidance Statement: Licence Duration, May 2015



## 5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration
03/05/2016	Proponent sent a copy of draft instrument	Minor comments.	Adopted



## 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