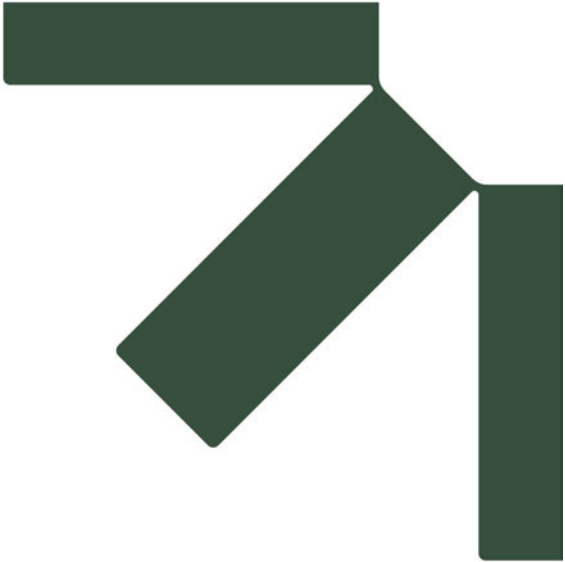




Attachment 8D

Tyrecycle National Emergency Management Plan



Tyrecycle Emergency Management Plan

Version 1

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Figure 1 Risk assessment matrix

Likelihood	Consequence					
	Negligible Injury - First aid treatment	Minor Injury - Injury requiring medical treatment	Moderate Injury - Injury requiring extensive medical treatment	Major Injury - Injury resulting in permanent incapacitation	Catastrophic Injury - Injuries resulting in single or multiple deaths	WHS
	Negligible or no quality damage/impact	Minor quality damage/impact	Significant quality damage/impact	Major quality damage/impact	Extensive quality damage & loss	Quality
	Negligible or no environmental damage/impact	Minor environmental damage/impact	Significant environment damage/impact	Major environmental damage/impact	Extensive environmental damage & biodiversity degradation	Environment
	Negligible financial loss <= \$5k	Notable financial loss \$5k - \$50k	Substantial financial loss \$50k - \$500k	Significant financial loss \$1m+	Extensive financial loss \$5m+	Business
Almost Certain	11 Medium	16 High	20 High	23 Extreme	25 Extreme	
Likely	7 Medium	12 Medium	17 High	21 High	24 Extreme	
Possible	4 Low	8 Medium	13 Medium	18 High	22 High	
Unlikely	2 Low	5 Low	9 Medium	14 Medium	19 High	
Very Unlikely	1 Low	3 Low	6 Low	10 Medium	15 High	

.....6

1.0 Purpose

This Emergency Management Plan (EMP) has been created to have in place an emergency system, nominated personnel and designated duties prepared for any emergency event that may occur at a Tyrecycle sites. This EMP minimise the adverse impacts to people, property and the environment from any incident occurring or impacting on-site.

2.0 Scope

The scope of this document covers the identification, mitigation and response to any emergency situations that may arise to people, property and the environment from an incident occurring or impacting any Tyrecycle workplace.

3.0 Communication of this Plan

This Emergency Management Plan shall be uploaded in Skytrust, communicated to personnel through the induction, toolbox and pre-start meeting and Site-Specific Emergency Response plan should be displayed on site. Site-specific evacuation procedure is shown on the noticeboard and in prominent positions throughout the areas.

4.0 Internal References

- Site based Emergency Risk Assessments
- Site specific Emergency Evacuation Diagrams
- List of Site Warden and First Aid Posters
- Chief Warden/Warden/First Aider/CEO/HSEQ Duty Cards
- Chief Warden Checklist
- Site Specific Emergency Response Plan
- R638 First Aider Responsibilities
- R639 Warden Responsibilities
- PR602 Incident Management Procedure

5.0 Definitions

DEFINITIONS	
Chief Warden	A nominated person who will take control in an emergency and provide a coordinated response and evacuation as appropriate.
Emergency	An event that arises internally or from external sources may adversely affect the occupants or visitors in a facility or the environment and requires an immediate response.
First Aider	Nominated persons who have completed appropriate training to respond to an injury, illness, or disease requires first aid treatment.
Incident	A sequence of events that causes actual or potential; harm to people or the environment, damage to equipment, actual or potential harm to company reputation, or involves non-compliance with legislative requirements or commitments otherwise applicable to our operations and activities.
Notifiable Incident	A pollution incident that causes or threatens to cause “material harm” to human health or the environment. Also fatalities and certain serious injuries/illnesses, dangerous incidents or COVID-19 cases that occur at work as a result of the conduct of the business or undertaking.
Warden	Nominated persons who have completed appropriate training to assist in response or evacuation during an emergency.

6.0 Emergency Response Team

All Chief Wardens, Wardens, First Aiders are issued duty cards describing their roles in a ready-reference format. These are to be kept with identifying caps/helmets and, in the event of an emergency or evacuation drill, are used to indicate critical roles and responsibilities.

In the event of an emergency or evacuation drill:

6.1 Chief Warden shall be responsible for the following functions:

- To act as the overall controller for the site in an emergency
- To establish the nature of the emergency
- To maintain an accurate record of the incident using F654 Chief Warden Checklist
- To ensure that the emergency services are notified **if required**
- To control site traffic, no one in or out except emergency services
- To notify neighbouring property holders as required
- To communicate with and delegate duties to the Wardens
- To initiate and activate an evacuation when necessary
- To ensure that in case of fire, the **stormwater isolation valves** are closed
- To confirm the whereabouts of all staff, contractors and visitors
- To provide an accurate situation report to the attending Emergency Services
- To communicate the end of the emergency to all stakeholders
- To notify the **National HSEQ Manager** of the emergency as soon as practical
- To chair a post-incident/post evacuation drill debrief meeting
- To complete a post-incident/post evacuation drill evaluation in Skytrust

6.2 Wardens shall be responsible for the following functions:

- To follow the instructions of the Chief Warden
- To assist the Chief Warden in the orderly evacuation of the site
- To ensure that all persons evacuate following instructions
- To encourage people to be calm, alert and to follow instructions
- To systematically check all assigned areas are cleared or delegate this task
- To ensure that mobility-impaired persons evacuate last and where possible, advise them of this before an emergency
- To encourage people to **shut down plant and equipment** if safe to do so (such as pressing the emergency stop button or turning off the ignition)
- To provide accurate information of the evacuation in their area to the Chief Warden
- To assist with emergency services as required
- To attend a post-incident/post evacuation drill debrief meeting

6.3 First Aiders shall be responsible for the following functions:

- To provide first aid treatment that falls within their scope of practice or training and in line with current first aid standards and guidelines (see Australian Resuscitation Council guidelines for further information)
- To take the first aid kit to the assembly point
- To provide a medical handover to emergency services
- To record all first aid treatment administered and actions taken
- To make themselves available to assist the Chief Warden in the event of an emergency
- To attend a post-incident/post evacuation drill debrief meeting

6.4 National HSEQ Manager/Environmental Manager shall be responsible for the following functions:

- To **notify the applicable regulatory authorities** if the emergency involves a notifiable incident such as a fatality or severe injury
- To **immediately notify** the relevant authority in the event of a non-compliance with an environmental licence condition or as required by an environmental licence
- To coordinate any media response required
- To conduct incident investigation for Medium and high risk incidents
- To notify stakeholders post-incident of emergency events such as external agencies, senior management; board of directors; neighbouring properties, safety committee.
Consideration should also be given to inform staff, contractors or agents at interstate worksites who may be likely to endure the same plant fault or system failure
- To arrange for any remediation of the site such as removal of fire water or site security concerns

6.5 State Level Managers shall be responsible for the following functions:

- Plant Managers (or equivalent) are responsible for ensuring that there is always a designated first aider and warden on-site at all times that their site is operating.
- Plant and Customer Service Managers must always consider emergency response requirements when reviewing and approving leave applications.

7.0 Risk Identification

Tyrecycle has considered all foreseeable emergencies and prepared Site-Specific Emergency Response Plan for each worksite. These encompass the likelihood and consequences of all types of emergencies such as fire (tyre or bush), flood, chemical spill, medical conditions, etc. Tyrecycle operates under strict environmental licences and state-based fire guidelines for tyre stock management. Every Tyrecycle site works within a stock management plan that reduces the likelihood and severity of any potential fire event.

7.1 Risk register

All risks are assessed and stored electronically in the live Risk Register on Skytrust. The register is populated by identified risks arising from Plant Risk Assessments, reporting hazards or other means within the system. Controls are added following the initial risk assessment, and a residual risk score is given.

The risk register has an inbuilt review mechanism that prompts reviewers via email when the risk is due for review.

Figure 1 Risk assessment matrix

	Consequence					
	Negligible Injury - First aid treatment	Minor Injury - Injury requiring medical treatment	Moderate Injury - Injury requiring extensive medical treatment	Major Injury - Injury resulting in permanent incapacitation	Catastrophic Injury - Injuries resulting in single or multiple deaths	
Likelihood	Negligible or no quality damage/impact	Minor quality damage/impact	Significant quality damage/impact	Major quality damage/impact	Extensive quality damage & loss	WHS
	Negligible or no environmental damage/impact	Minor environmental damage/impact	Significant environment damage/impact	Major environmental damage/impact	Extensive environmental damage & biodiversity degradation	Quality
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Possible	4 Low	8 Medium	13 Medium	18 High	22 High	
Unlikely	2 Low	5 Low	9 Medium	14 Medium	19 High	
Very Unlikely	1 Low	3 Low	6 Low	10 Medium	15 High	

7.1.1 Aspect & Impact Register

The environmental aspects and impacts identified for each site are listed in the Aspect Impact Register. The register has been developed by the Environmental Manager in consultation with the site managers and National Operations Manager, who has determined each aspect and impact by their environmental significance. The determination of these was in part contributed by the activities, tasks and processes that occur on each site; in part by the requirements of the licence at each site; in part by other contributing guidelines and external requirements; in part by historical hazards and incidents raised; and in part by physical observations of each site operating.

Every operational Tyrecycle licence condition is treated as a significant environmental aspect. All weighting of other identified aspects is risk assessed on a case-by-case basis.

The contents of the aspect impact register are maintained by the relevant Managers, who are prompted by email when due for review. Responsibility for maintaining their Register component is listed in the applicable task skills matrix.

8.0 Prevention

In the event of an emergency situation/serious incident at Tyrecycle, the following steps should be undertaken by the Emergency Response Team:

1. Triage (Site Warden):
 - a. Ensure the area is safe and prevent further incident
 - b. Don't disturb the scene
 - c. Assisting an injured person(s)
 - d. Secure and preserve the scene
2. Notify Chief Warden

8.1 Existing Fire Prevention Measures

For each of the control measures, a summary of the management if that control is provided:

a) Site security (apply for most of the sites)

- Site security is provided by high boundary fence with barbed wire overhang around the site.
- Site entry gate, which currently remains closed for all non-operating hours.
- External security contractor monitors site outside of operating hours and includes periodic drives daily through the site to check office, factory, and yard security.
- CCTV. Camera footage retention at Somerton is kept for three months.

b) Grass cutting

During the spring growth periods, the length of the grass is monitored, and the local Council is contracted to mow the grass to reduce the risk of a grass fire being an ignition source for a tyre fire.

c) Stock Control

The stocking levels on site are maintained to control the maximum fuel load onsite. The licensed limit in every site is tracked in the Skytrust system. Also, refer to Stockpile management Plan for each site.

d) Ignition Source Control

Ignition sources are controlled on-site, with controls on the use of naked flames and spark-producing activities through the Hot work permit system – refer to document Hot Permit to Work SOP - Hot Works form V2.0.pdf

e) Contamination Control

The tyre shred and crumb piles are monitored to ensure no organic material contamination, providing more readily ignitable material from heat accumulation in the piles. Tyres are checked before being fed to the crumbing conveyor.

f) Thermal Scans (apply for most of the sites)

Thermal scans are undertaken of electrical systems to ensure that thermal hot spots in circuits through poor connections and other deterioration are detected before they lead to potential ignition sources.

8.2 Emergency Response Equipment

The availability and location of the firefighting equipment to support the functions identified in the plan should be indicated on the site layout plan, please refer to the site specific Emergency Response Plan.

- Location: Portable extinguishers and fire hoses are placed in readily accessible locations and areas where fire risk is likely.
- Access: clear access is to be maintained around fire extinguishers and hoses at all times.
- Signage: Signage is to be provided at each location, indicating the type of fire extinguisher and fire types suited.
- Mounting: Fire extinguishers are mounted on purpose made hooks or brackets and suspended above the floor.
- Inspection: 3rd party will inspect fire extinguishers and maintain them every six months.

Fire maintenance of all firefighting equipment, including extinguishers, hose reels, tanks, alarms, sprinkler systems, dousing systems, pumps and hydrants, are routinely carried out by certified 3rd party. The activation of these services, of improvements and actions identified through them and the management of these records, is the responsibility of the Plant/Operations Manager at each site.

First aid supplies are restocked on an as-needs basis, and the first aiders identify deficiencies through quarterly inspections.

8.3 Training

Employees and contractors receive site induction and regular training to ensure that they can successfully implement and comply with legislative obligations and ensure that Tyrecycle's workplaces can prepare for and deal with an emergency. An **annual training exercises program** should be scheduled to test Tyrecycle, test procedures and employees' responses to an emergency. All the support are maintained in Skytrust.

- All Wardens hold the nationally recognised competencies of "Operate as Part of an Emergency Control Organisation and Confine Small Workplace Emergencies". In addition to this, Chief Wardens have "Lead an Emergency Control Organisation" competency.
- All Wardens and Chief Wardens are competent for their tasks, as set out in R639 Warden Responsibilities, through training, experience, or a combination of these.
- Designated Workplace First Aiders are trained and current to at least a standard of the nationally recognised competency.
- All inductions include instructions of what to do in an emergency and familiarisation with the Emergency Evacuation Diagram and the assembly point for that site.
- Records of all training attendance and refresher intervals are maintained in Skytrust.

8.4 Emergency Drills

Emergency drills are conducted to test the emergency response on site. These are conducted at least twice per year in line with local regulations. This exercise tests duty holders' responses and reactions, identify improvement opportunities and facilitates communication.

A debriefing meeting is conducted after each exercise attended by the Chief Warden, Wardens and First Aiders. The outcomes and names of those attending the debriefing meeting are recorded within Skytrust to review and act upon any opportunities for improvement.

8.5 Emergency Identification and Assessment

Actual or potential emergencies will vary in type and severity. The required level of response and notification will be at the discretion of the Site Supervisor. Any emergency may require only isolated

containment and control or the complete evacuation of the site and notification of relevant emergency services. Consideration should be made of the response requirements for different situations. If there is uncertainty on how to proceed at any time, the response should be for the worst possible scenario. Ultimately, the Site Manager or representative has the authority and responsibility to instigate an evacuation if they feel it is warranted.

9.0 Emergency Response Plan

Each site has site specific Emergency Response Plan and contact list posted at the notice board and uploaded in Skytrust

External Notifications:

- Emergency services as applicable – Police, Ambulance, Fire Brigade
- EPA or Safe work should be notified only by the National HSEQ Manager and Environmental Manager as per the notifiable incidents requirement:

10 Recovery

Immediately after the emergency is over, the Emergency Team will arrange for an investigation and a written report of the incident to be prepared. The investigation will include a detailed review of the sequence of events and communications and actions taken immediately prior to, during and after the emergency situation.

The report will include a review of the EMP and recommend changes as required. It will be produced and complete within 28 days of the emergency and content:

The report will contain the following information:

- Introduction
- Findings of the report
- Analysis and discussion of the findings, including background and information on the details of the incident, identification of the root causes, discussion of any quick fixes to prevent recurrence while longer-term corrective actions are identified, disciplinary actions proposed to prevent recurrence and how to review these corrective actions to ensure their effectiveness
- Any relevant operating history of the site
- References
- Conclusions
- Recommendations including the EMP review and preventative measures

Recovery activities are primarily concerned with restoring the work site/ environment to its pre-emergency condition. Depending on the nature/effect of the emergency, this may include reconstruction of the physical infrastructure, restoration of the emotional, social, economic and physical well-being of the workforce/workplace. During recovery operations, actions are taken to minimise the recurrence of the hazard and/or lessen its effects.

10.1 Post Emergency Activities

The debriefing shall review (but not be limited to) the following:

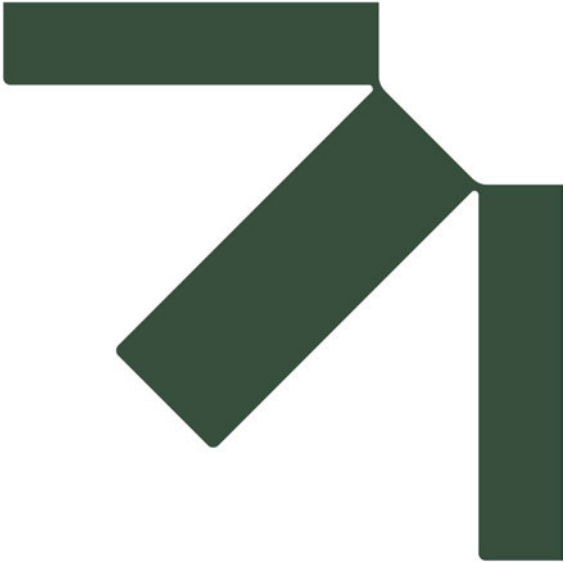
- Staffing
- Plant and equipment
- Processes and procedures
- Material inventories
- Difficulties encountered
- Access to any Employee Assistance Programs

11.0 Monitoring and Review

This procedure must be reviewed according to document control procedures for accuracy against current legislative and industry best practice requirements. It must also be reviewed when there are changes to the workplace that may impact the contents of this procedure.

The emergency risk assessments are reviewed annually to ensure that the EMP matches the identified risks and is effective as variables in the business and its surrounding change. Reviews will also be conducted based on changes or incidents.

Any updates are communicated to all stakeholders, and if additional training is required, it must be carried out promptly.



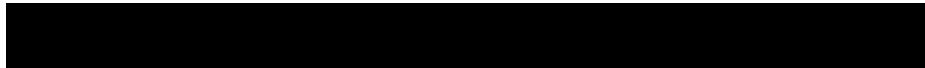
Attachment 8E

Waste Management Plan

Waste Management Plan

Tyrecycle Pty Ltd

Tyre Recycling and Processing Facility



SUMMARY

The waste collection methodology from the subject site will be facilitated by a private contractor. General waste will be collected once per week and recycling waste will also be collected once per week. Bins will be collected from a bin collection/storage area at the subject site. Bins will be moved by the centre manager prior to collection and moved back into the enclosures immediately (or as soon as practically possible) after being emptied.

Table 1: Proposed Waste Collection Summary – Warehouse/Shed and Office

	Bin Size (L)	No. of Bins	Collection Frequency	Collection
General Waste	1,500	2	1 time per week	Private Contractor
Recycling	1,500	2	1 time per week	

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1. INTRODUCTION

This Waste Management Plan (**WMP**) has been prepared in support of a Development Application which proposes to develop a Tyre Recycling Facility (**proposed development**) at [REDACTED] and [REDACTED] (the **subject site**). This WMP has been prepared by Rowe Group and Tyrecycle Pty Ltd to outline how the general and recyclable waste generated from the proposed development is to be stored and collected from the subject site.

2. OBJECTIVES AND SCOPE

The objective of this WMP is to outline the equipment and procedures that will be adopted to manage general and recycling waste generated from the proposed development at the subject site.

This WMP demonstrates that the proposed development has been designed to:

- Adequately cater for the anticipated quantities of general waste and recyclables to be generated by the proposed development;
- Provide a suitable Bin Storage Area including appropriate receptacles for the proposed development; and
- Allow for efficient servicing of receptacles by appropriate waste collection vehicles to the proposed development.

The scope of this WMP comprises the following:

- Section 3: Warehouse/Shed and Office Waste Management; and
- Section 4: Conclusions.

3. WAREHOUSE/SHED AND OFFICE WASTE MANAGEMENT

3.1 PROPOSED OPERATIONS

The operations of the proposed development will occur in the warehouse/shed building (includes office and amenity areas) at the subject site. The warehouse/shed includes office and amenity areas, and occupies a total floor area of 2,400m². The proposed development will operate between 7:00AM and 5:00PM, Monday to Friday.

Waste will be collected by a private contractor from the subject site as follows:

Table 2: Proposed Waste Collection Summary – Warehouse/Shed and Office

	Bin Size (L)	No. of Bins	Collection Frequency
General Waste	1,500	2	1 time per week
Recycling	1,500	2	1 time per week

3.2 WASTE GENERATION

3.2.1 Waste Generation Rates

The estimated waste generation has been calculated based upon the expansion of the current arrangements at the subject site and using the waste generation rates from the City of Melbourne's *Guidelines for Preparing a Waste Management Plan* (2021).

Table 3: Waste Generation Rates

	GENERAL WASTE GENERATION RATE	RECYCLING WASTE GENERATION RATE
Warehouse (office)	10L / 100m ² / day	10L / 100m ² / day

3.2.2 Waste Generation Volumes

Based on the above waste generation rates and the proposed floor area (2,400m²), the estimated volume of waste generated by the facility is as follows:

- General Waste: 240L / day = 1,200L / week; and
- Recycling: 240L / day = 1,200L / week.

3.3 WASTE STORAGE

3.3.1 Receptable Requirements

Based on the above waste generation rates and the anticipated frequency of collection, the proposed development at the subject site requires the following bins:

- One (1) 1,500L general waste receptacles; and
- One (1) 1,500L recycling receptacles.

Both general and recycling waste bins will be collected by a private contractor once per week from the subject site. The proposed development will have the capacity to store the following volumes of waste:

- General Waste: 1,500L / week; and
- Recycling: 1,500L / week.

3.3.2 Receptacle Size

The typical dimensions are shown in **Table 4** below.

Table 4: Typical 1,500L Receptacle Dimension

RECEPTACLE SIZE (L)	DEPTH (M)	WIDTH (M)	HEIGHT (M)	AREA (M ²)
1,500	1.3	2	1.2	2.6

3.3.3 Bin Storage Area Size

To ensure sufficient area is available for storage of the bins prior to servicing, the quantity of the bins was modelled on receptacle sizes of 1,500L.

Based upon typical 1,500L receptacle dimensions as per Table 4, the placement of the bins within the Bin Storage Area has been considered. Two (2) 5m x 4m Bin Storage Areas are proposed to be located in the southern portion of the subject site, near one (1) of the crossovers to [REDACTED].

The bin compound is of sufficient size and shape to accommodate the four (4) bins, in an arrangement which permits access to all bins.

3.3.4 Design

There are two (2) Bin Storage Areas that are approximately 5m x 4m in dimension, respectively, which will hold 4 bins (two (2) in each storage area) that are approximately 2m x 1.3m in dimension, respectively. The bin pickup area is located on the northern side of the storage areas, and there is a hose cock to facilitate cleaning as well as an existing drain to capture runoff (Refer Figure 1 below).

Figure 1: Bin Storage Area Plan



3.4 WASTE COLLECTION

The bins will be kept in the Bin Storage Areas for collection by a private contractor.

3.5 WAREHOUSE/SHED AND OFFICE WASTE MANAGEMENT ACTIVITIES

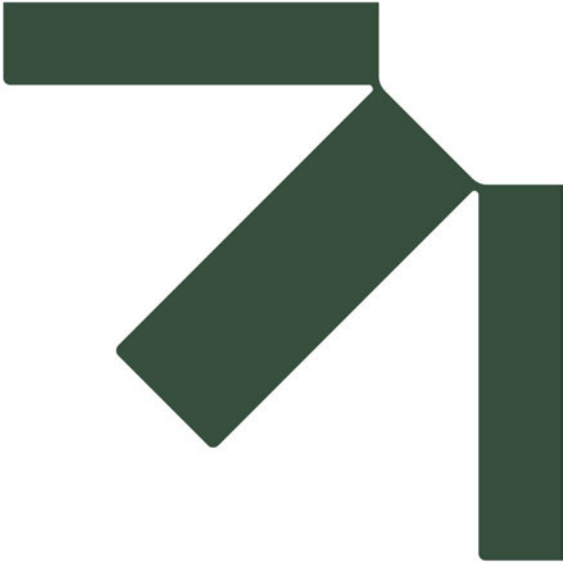
The centre manager will be responsible for managing the waste collection at the proposed development. The centre manager will be responsible for completing the following tasks:

- Wheeling the bins required to be emptied from the Bin Storage Area one at a time during collection times;
- Monitoring of waste composition to identify opportunities for source separation of recycling waste materials and waste reduction activities;
- Maintenance of the Bins and the Bin Storage Area; and
- Cleaning of the Bins and the Bin Storage Area when required.

4. CONCLUSIONS

The proposed development at the subject site will be serviced by two (2) 1,500L general waste bins and two (2) 1,500L recycling bins, which will be collected once per week by a private contractor. The bins will be moved by the centre manager prior to collection and moved back into the enclosure immediately (or as soon as practically possible) after being emptied.

This WMP demonstrates that the proposed development at the subject site will be serviced by sufficient bin storage facilities to accommodate for the estimated generated waste (general and recycling waste).



Attachment 8F

Pest Management Plan

Pest Management Plan - Wedgefield



Pests	Control Measure	Action	Frequency	Corrective Action	Person Responsible
Rodents (rats and mice)	Traps	Traps to be installed as per contractor recommendations. Check the traps and look for signs of pests.	Every 1-3 months as per contractor recommendations	Empty/replace traps where required. Adjust frequency of checks if necessary.	Pest Control Contractor
Crawling insects (ants, cockroaches etc)	Feed stations	Feed stations to be installed as per contractor recommendations. Check the feed stations and look for signs of pests.	Every 1-3 months as per contractor recommendations	Empty/replace feed stations where required. Adjust frequency of checks if necessary.	Pest Control Contractor
Flying insects (flies, mosquitos etc)	Fly screens	Check that office and lunchroom fly screens are in tact and free from holes. (To be covered in IPI inspections)	Monthly	Replace damaged fly screens where required.	Site Manager
	Stock management	All tyres to be processed within 72 hrs of arriving at site. FIFO stock management approach to be followed.	Ongoing	Increase shifts/overtime as required to manage tyre stock levels.	Site Manager
Birds and animals	Physical barriers	Keep all office and lunchroom doors (points of entry) closed. Check doors are in good working order and can effectively block access for pests. (To be covered in IPI inspections)	Monthly	Install/replace door seals/skirts where required and fix broken doors.	Site Manager
All pests	Eliminate food source	Check that food preparation and meals areas are kept clean, tidy, and free from food scraps. Ensure sufficient bins are available and being emptied as per cleaning schedule and Waste Management Plan. (To be covered in IPI inspections)	Monthly	Throw away food scraps immediately. Order new bins and adjust cleaning schedule frequency where required. Review Waste Management Plan.	Site Manager

Date: 2/3/2023

Author: [REDACTED]



Attachment 8G

Stormwater Management Plan

Stormwater Management Plan

Tyrecycle

Prepared for: Tyrecycle Pty Ltd

Date: August 2023

File Reference: 5186_810_001

DOCUMENT CONTROL

PROJECT/REPORT DETAILS

Document Title:	Stormwater Management Plan
Principal Author:	[REDACTED]
Client:	Tyrecycle Pty Ltd
Reference Number:	5186_810_001

DOCUMENT STATUS

Issue	Description	Date	Author	Reviewer
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DISTRIBUTION RECORD

Recipient	Delivery Method
Tyrecycle Pty Ltd	1 x Electronic
Town of Port Hedland	1 x Electronic

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DRAWINGS

Drawing No. 5186.DRG.003 *Stormwater Management Layout Plan*

ATTACHMENTS

Attachment 1 Detailed Site Survey
Attachment 2 Development Plans

1 Introduction

1.1 Overview

Groundwork Plus have been engaged by Tyrecycle Pty Ltd (Tyrecycle) to prepare a Stormwater Management Plan (SMP) for a new resource recovery centre (tyre recycling and processing facility), to be located at Lot [REDACTED] (No. 20) and [REDACTED] (No. 22) [REDACTED] Western Australia (the Site) (refer Figure 1 – Site Location for details).

Refer to Drawing No. 5186.DRG.003 – Stormwater Management Layout Plan, Appendix 1 – Detailed Site Survey, and Appendix 2 – Development Plans for the stormwater management system layout, detailed site survey, and proposed development details.



Figure 1 – Site location

1.2 Objectives of the SMP

The scope of this SMP includes the following items:

- Demonstrate non-worsening of peak discharge from the Site in all annual exceedance probability (AEP) events.
- Compliance with the *Town of Port Hedland Local Planning Policy #11 Stormwater management (LPP/11)*, including measures to retain the one (1) in five (5) year average recurrence interval (ARI) (six [6] minute duration) rainfall event.
- Details of drainage to lawful point of discharge, up to and including the one (1) in 100-year ARI event.
- Details of final proposed surface levels and treatments.
- Implementation and maintenance strategy for stormwater management measures and systems.

This SMP outlines the engineering design details and operational management procedures that are to be maintained and/or adopted in order to integrate stormwater management into the daily operations.

2 Stormwater quantity management

In accordance with LPP/11, it is a requirement that stormwater is retained on-site to accommodate a minimum of a one (1) in five (5) year ARI (six [6] minute duration) rainfall event.

Overflow stormwater (excess of the one (1) in five (5) year ARI event) will be directed towards the Town of Port Hedland's (Town's) drainage system from the existing Site discharge point in the northwestern corner of the Site. Post-development discharge is proposed to meet non-worsening discharge rates in comparison to the existing case scenario.

2.1 Intensity – Frequency – Duration data

To demonstrate compliance with LPP/11, hydrologic modelling was undertaken using DRAINS (a computer simulation program by Watercom). Site-based rainfall polynomial coefficients were obtained using the Intensity-Frequency-Duration (IFD) generation tool, available on the Bureau of Meteorology's (BoM) website.

The IFD data is shown below in **Table 1 – IFD data** and is consistent with the probability terminology for the new edition of Australian Rainfall and Runoff (ARR2016). As noted, the one (1) in five (5) year ARI is referenced as the 0.2EY event.

Based on the available BoM data, the one (1) in five (5) year ARI (six [6] minute duration) rainfall event corresponds to a rainfall intensity of 117 millimetres per hour (mm/h), or 11.7 mm in six (6) minutes.

Table 1 – IFD data

Duration of rainfall	AEP						
	6EY	4EY	3EY	2EY	1EY	0.5EY ¹	0.2EY ²
6 minutes	16.30	26.80	34.50	46.00	66.90	86.70	117.00
10 minutes	13.80	23.20	30.00	40.20	58.80	76.30	103.00
15 minutes	11.70	19.70	25.60	34.40	50.70	65.80	88.50
20 minutes	10.10	17.10	22.30	30.10	44.50	57.70	77.60
25 minutes	8.94	15.10	19.80	26.80	39.80	51.50	69.10
30 minutes	8.03	13.60	17.80	24.10	36.00	46.60	62.50
45 minutes	6.19	10.50	13.80	18.80	28.40	36.70	49.30
1 hour	5.06	8.61	11.40	15.50	23.70	30.70	41.30

Please note:

¹ The 0.5EY design rainfall corresponds to the two (2) year ARI IFD, not the 50% AEP IFD.

² The 0.2EY design rainfall corresponds to the five (5) year ARI IFD, not the 20% AEP IFD.

2.2 Stormwater hydrology

Refer to **Table 2 – Site catchment areas** for details of the existing and proposed developed catchment hydrology for the development.

Table 2 – Site catchment areas

Scenario	Catchment area (hectares [ha])	Impervious (%)	Time of concentration (minutes)	Discharge location
Existing scenario	1.29	80	5.50	Northwestern boundary
Proposed development	1.29	100	5.00	Northwestern boundary

2.2.1 Existing scenario

The existing site comprises exposed gravel/granite pavements and subsoils with low infiltration (therefore considered 80% effective impervious). Boundary swales have been constructed along the northern and western boundaries as shown in the detailed site survey included in **Attachment 1 – Detailed Site Survey**.

2.2.2 Proposed scenario

The proposed site formalises the area into 100% impervious roof areas and trafficable gravel/granite pavements (therefore considered 100% effective impervious). The boundary swales are proposed to remain unchanged along the northern and western boundaries; however, the swale will be widened in the northwestern corner of the Site to accommodate additional storage, as shown in the development drawings included in **Attachment 2 – Development Plans**.

2.3 Lawful point of discharge

The lawful point of discharge for the Site will be the existing discharge point at the lowest elevation of the boundary swales (northwestern corner).

2.4 Hydrologic modelling

In order to model the proposed Site and demonstrate retention of the one (1) in five (5) year ARI (six [6] minute duration) rainfall event, hydrologic modelling was undertaken using DRAINS, as shown in **Diagram 1 – DRAINS schematic**. Site-based rainfall polynomial coefficients were obtained using the IFD generation tool, available on BoM website, as highlighted in section 2.1.1 **Intensity – Frequency – Duration data**.

2.4.1 Peak discharge comparison

Peak discharge was modelled for each ARI/AEP event, as shown in **Table 3 – Peak discharge comparison**. As demonstrated in the modelling, there is non-worsening of peak discharge at the Site discharge locations for all AEP events, and the Site retains all runoff from the one (1) in five (5) year ARI (six [6] minute duration) rainfall event; therefore, complying with LPP/11. As the Site does not increase any runoff or discharge, there are no changes to the existing town stormwater drainage system required.

Diagram 1 – DRAINS schematic

Drains site layout



Model simulation results for 0.2EY AEP (one [1] in five [5] year ARI) 10-minute storm



Model simulation results for 1% AEP 10-minute storm



Table 3 – Peak discharge comparison

Discharge location	Scenario	Peak discharge for AEP (cubic metres per second [m ³ /s])					
		1%	2%	5%	10%	0.2EY	0.5EY
Northwestern swale spillway	Existing scenario	0.706	0.620	0.514	0.428	0.348	0.242
	Developed scenario	0.194	0.079	0.000	0.000	0.000	0.000

3 Operational procedures

An overview of the additional operational procedures for implementation at the Site is summarised below.

Aspect	Details
Purpose	The operational procedures have been prepared to manage potential environmental impacts that may result from the operation in relation to stormwater management.
Risk sources and potential impacts	Adverse impacts resulting from current and future operations may include the following: • Overland flows from storage and handling areas of oils, greases, and other chemicals. • Hydrocarbons and chemicals. • Construction and maintenance of carpark, roads, and hardstands. • Spillage during handling of materials. • Use and storage of oils, greases, and other chemicals.
Performance targets	It is proposed that the facility adheres to the requirements of the development approvals and SMP.
Responsibilities	The Site Manager will be primarily responsible for the implementation of this SMP.
Strategies/mitigation measures	<i>Chemical and oil bunding</i> Clearly designate storage areas and do not deviate from assigned bunded areas for storage of chemicals, unless a suitable secondary bund is provided. • All empty drums must be stored on a concrete hardstand area, with their closures in place. Storing and handling of hazardous chemicals, corrosive substances, toxic substances, gases, dangerous goods, flammable and combustible liquids, in accordance with the relevant legislative requirements and Australian standards, including, but not limited to, the provisions of: • AS 1692:2006 – <i>Steel tanks for flammable and combustible liquids</i> • AS 3780:2008 – <i>The storage and handling of corrosive substances</i> • AS 1940:2004 – <i>The storage and handling of flammable and combustible liquid</i> • AS 3833:2007 – <i>Storage and handling of mixed classes of dangerous goods, in packaged and intermediate bulk containers.</i> <i>Erosion and sediment control (ESC)</i> • ESC structures (comprising the infiltration swales) must be maintained at all times during the period of facility operation, and regularly checked to inform repairs, as required. • Any sediment collected in the infiltration swales must be removed whenever the storage capacity is reduced by 30%, or where a build-up of sediments has occurred, or may occur, around the outlet structure. • Drainage through and from all trafficable areas and production activities must be designed to minimise surface flow velocities.
Auditing	Stormwater management reviews are required to be carried out on a periodic bases, to assess the implementation of the management strategies.

Aspect	Details
Identification of incident or failure	Non-compliance with the performance criteria herein will be identified by: - Stormwater in treatment system exceeding capacity after a rainfall event, due to insufficient freeboard. - Release of contaminants from the Site. - Poorly maintained, damaged, or failed stormwater management devices.
Corrective action	The authorised representative shall be responsible for the identification of an incident or failure, and the completion of corrective actions. Following identification of an incident or failure, the source/cause is to be immediately identified and rectified, with records kept preventing future incidents occurring.
Internal reporting	A copy of all incidents and complaints will be stored at the Site, within the incident and complaint register.
External reporting	Reporting of non-compliance events, including discharge of contaminants from the Site, are to be reported in accordance with regulatory requirements.

An inspection and maintenance program should be implemented, as detailed in **Table 4 – Inspections and maintenance of stormwater treatment devices**. A summary schedule of the various inspections, performance criteria, and responses that shall be performed at the Site is outlined below.

Table 4 – Inspections and maintenance of stormwater treatment devices

Device	Minimum frequency	Performance criteria	Required actions
Infiltration swales	Prior to a forecast rainfall event and following each rainfall event; otherwise, monthly.	Spillway/batters in satisfactory condition, no erosion or silt build-up.	- Volume to be restored if silt has reduced volume by more than 30%. - Any identified damage to be repaired.
Waste containers	Weekly	- Waste is stored in appropriate containers. - Waste receptacles labelled.	Ensure waste material is stored and disposed of properly and in accordance with the conditions of approval.
Spill response stations	Weekly and following use.	Equipment is properly maintained.	- Maintain equipment. - Replace used equipment.
Maintenance/refuelling area	Weekly	- Fuel/oil spills. - Equipment maintenance.	- Clean up fuel/oil spills and investigate source. - Maintain equipment maintenance records. - Investigate and repair potential leaks.

4 Responsibilities

4.1 Monitoring management measures

The following management measures will be implemented during facility operations:

- The Site Manager, or authorised representative, is to regularly inspect the stormwater management system, particularly prior to forecasted wet weather, and following major rainfall events, to ensure that these devices are in good working order.
- A surface water quality monitoring program may be implemented to assess performance from time to time. Any sampling conducted shall be undertaken by a suitably qualified person.

4.2 Responsibility

The following details the responsibilities with regard to the ongoing management of stormwater at the site:

- The Site Manager will be responsible for the implementation of this SMP, and for the training of Site personnel in their responsibilities in relation to this SMP.
- The Site Manager will be responsible for ensuring that all stormwater devices constructed on the Site have adequate free water storage capacity.
- All complaints pertaining to water quality received will be recorded in the complaints register/log maintained on-site.
- The Site Manager, or a suitably qualified consultant, will prepare water monitoring records, if and when required by the regulatory authority.
- Records, including results of any monitoring program undertaken on-site, complaints, or incidents will be kept on-site for a minimum of five (5) years.

4.3 Identification of incident or failure

An incident or failure may include, but not be limited to:

- deterioration in surface water quality within waters discharged from the Site
- receipt of a stormwater quality release complaint
- not maintaining on-site stormwater controls or treatment devices.

Any identification of an incident or failure will be recorded on-site.

5 Environmental incidents

The Site Manager will be responsible for ensuring that all employees at the Site are familiar with the procedure for recording incidents. Any employee who becomes aware of an incident, with actual or potential environmental implications, shall report it to the Site Manager, or delegate, immediately.

The Site Manager will notify upper management regarding any environmental incident. An Environmental Incident Report must be completed for all incidents.

Should reporting of an environmental incident to the relevant regulatory authority be required, this will be undertaken in accordance with the following:

- When an environmental incident occurs, the Environment Manager or Regional Manager of Operations will notify the administering authority via telephone and in writing.
- Following notification against this condition, an investigation and further reporting will be required, as per the sections below.

5.1 Investigation

All incidents should be investigated. The investigations should include:

- Determining what activities were being carried out at the time of the complaint/incident and any equipment involved.
- Identifying whether equipment or activities on-site were the cause of the incident or complaint.
- Determining what potential actions may be carried out to resolve the matter and/or minimise the likelihood of further impacts.

An assessment is to be conducted to determine what corrective actions are to be taken to remedy the matter and/or prevent a similar incident from occurring in the future. If monitoring is to be undertaken to investigate an incident or complaint, these results should be supplied with the final report to the administering authority.

5.2 Responsibility

A written notice may need to be provided to the administering authority, following the initial notification. General information likely to be required for any further reporting to the administering authority may include the following:

- The name of the operator.
- The name and telephone number of a designated contact person.
- A description of the event.
- The results of any monitoring performed in relation to the event.
- Actions taken to mitigate any environmental harm caused by the event.
- Proposed actions to prevent a recurrence of the event.

6 Conclusion

This SMP outlines the appropriate treatment measures and operational procedures to be adopted to integrate adequate stormwater management into daily operations and Site activity. Specifically, this document has been prepared to ensure that appropriate measures have been developed to meet the requirements of the Site approval conditions, and to support the proposed development.

Operational procedures outlined in this SMP will assist to ensure compliance as a minimum standard.

DRAWINGS

FILE NAME: P:\Labels\5186.DWG Tyrecycle Port Hedland Stormwater Management Plan V1.dwg

30 August 2023

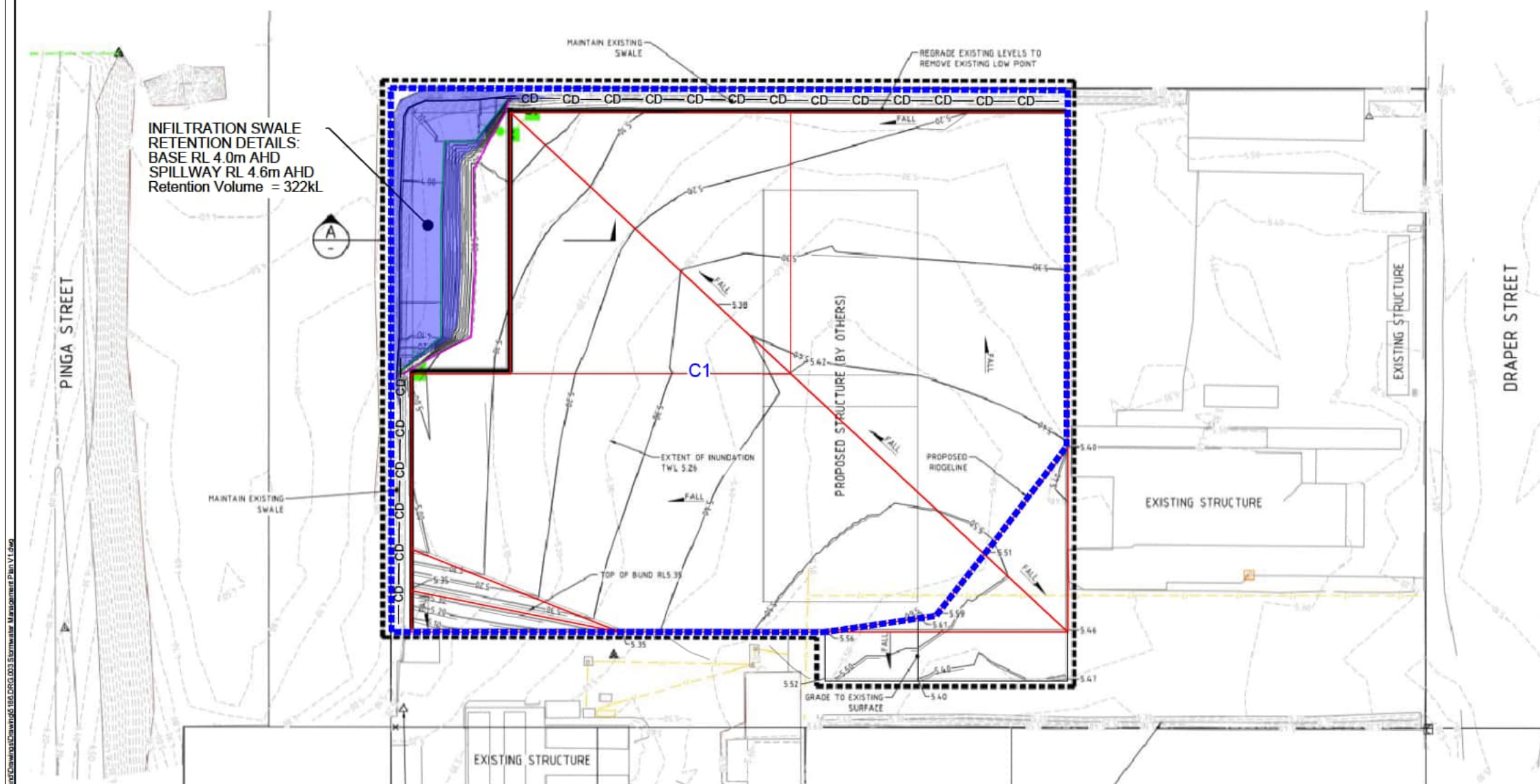
Issue For Information

REV	DESCRIPTION	DATE	BY
1	Original Issue	26-07-22	MAF

Data Sources:
Photography:
Topography:
Elevation:
Other:

THESE DESIGNS AND PLANS ARE COPYRIGHT AND ARE NOT TO BE USED OR REPRODUCED WHOLLY OR IN PART OR TO BE USED ON ANY PROJECT WITHOUT THE WRITTEN PERMISSION OF GROUNDWORK PLUS PTY LTD. ABN: 15 608 422 781

Legend: — Catchment Area
— CD — Existing Swale



- DRAWING NOTES:**
1. REFER DRAWINGS PREPARED BY JDSI CONSULTING ENGINEERS FOR ALL CIVIL ENGINEERING DESIGN DETAILS
 2. FINAL INFILTRATION SWALE AND OVERALL CATCHMENT DETAILS ARE TO BE GENERALLY IN ACCORDANCE WITH STORMWATER MANAGEMENT PLAN PREPARED BY GROUNDWORK PLUS.
 3. EXISTING AND PROPOSED LEVELS INDICATED ARE BASED ON SURVEY DATA AND DESIGN SUPPLIED BY CLIENT.

CATCHMENT TABLE

Catchment ID	Catchment Area (Ha)	Description
C1	1.29Ha	100% Impervious



PROJECT: Tyrecycle Port Hedland	TITLE: Stormwater Management Layout Plan
CLIENT: Tyrecycle Pty Ltd	GROUNDWORK plus
SCALE: 1:500	DRAWING NUMBER: 5186.DRG.003
DATE: 30 August 2023	REVISION: 1
PRINTED: 30 August 2023	DATUM: HORIZONTAL / VERTICAL / ZONE
CHECKED: JT	MGA / AHD / 56

ATTACHMENTS

Attachment 1

Detailed Site Survey

LEGEND

COMMUNICATIONS
MANHOLE CENTRE

DRAINAGE
GULLY EDGE
HEADWALL
PIPE INVERT LEVEL
STRUCTURE EDGE
SURFACE DRAIN
PIPE INVERT LEVEL
PIPE OVERT LEVEL
PIT CENTRE

ELECTRICAL
CONDUIT - UNDER GROUND
ELECTRIC STRUCTURE
CABLE BOX CENTRE
DOME/PILLAR
POWER POLE
SWITCHBOARD

RAILWAYS
GUARD RAIL

ROAD
BITUMEN ROAD EDGE
CENTRE OF ROAD
KERB - BOTTOM
KERB - TOP
SHOULDER
SIGN
SPEED HUMP
TRACK - EDGE

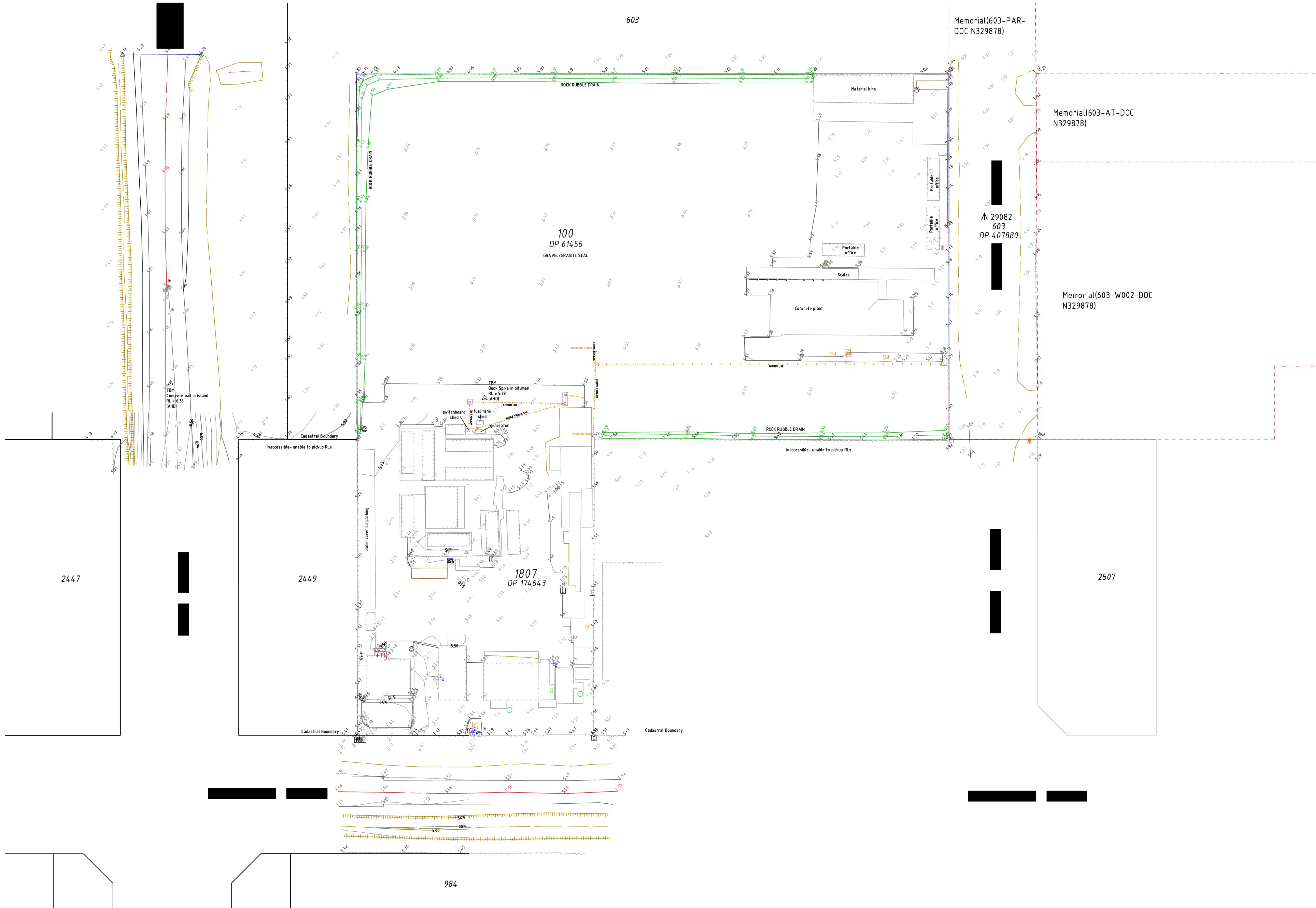
STRUCTURE
BUILDING - EDGE
CONCRETE - EDGE
FENCE
GATE
PAVING EDGE
RAMP
SHED
VERANDAH
FLOOR LEVEL
POST/BOLLARD

SURVEY
CADASTRAL BOUNDARY
MEMORIAL BOUNDARY
CONTROL STATION
PEG
TEMPORARY BENCHMARK

TOPOGRAPHY
BANK - TOE
BANK - TOP
MINOR CONTOUR
MAJOR CONTOUR
NATURAL SURFACE (SPOT HEIGHT)

UNDEFINED
MANHOLE EDGE

WATER
METER
TAP



NOTES

This plan has been prepared for the client and should not be used for any other purpose unless authorized by VERIS.

Cadastral boundaries shown are subject to survey.

Prior to the commencement of any work, relevant authorities should be contacted for the location of underground services.

Due to overwriting some levels may be switched off for this plot only.

Levels are based on AHD.

This note is an integral part of this plan.

Rev.	Date	Description	Surveyor	Drawn	Approved
01	2/03/23	ADDITIONAL PICKUP 10/02/23			
00	1/11/21	FIRST ISSUE			

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www.veris.com.au

Client: DAVID WILLS & ASSOCIATES

Surveyed By: SR Survey Date: 14/10/2021

Drawn By: AK Drawn Date: 1/11/2021

Approved By: PRJ

Scale (A1): 1:600

Hor Datum: PHG94

Vert Datum: AHD (Based on_VRS GPS)



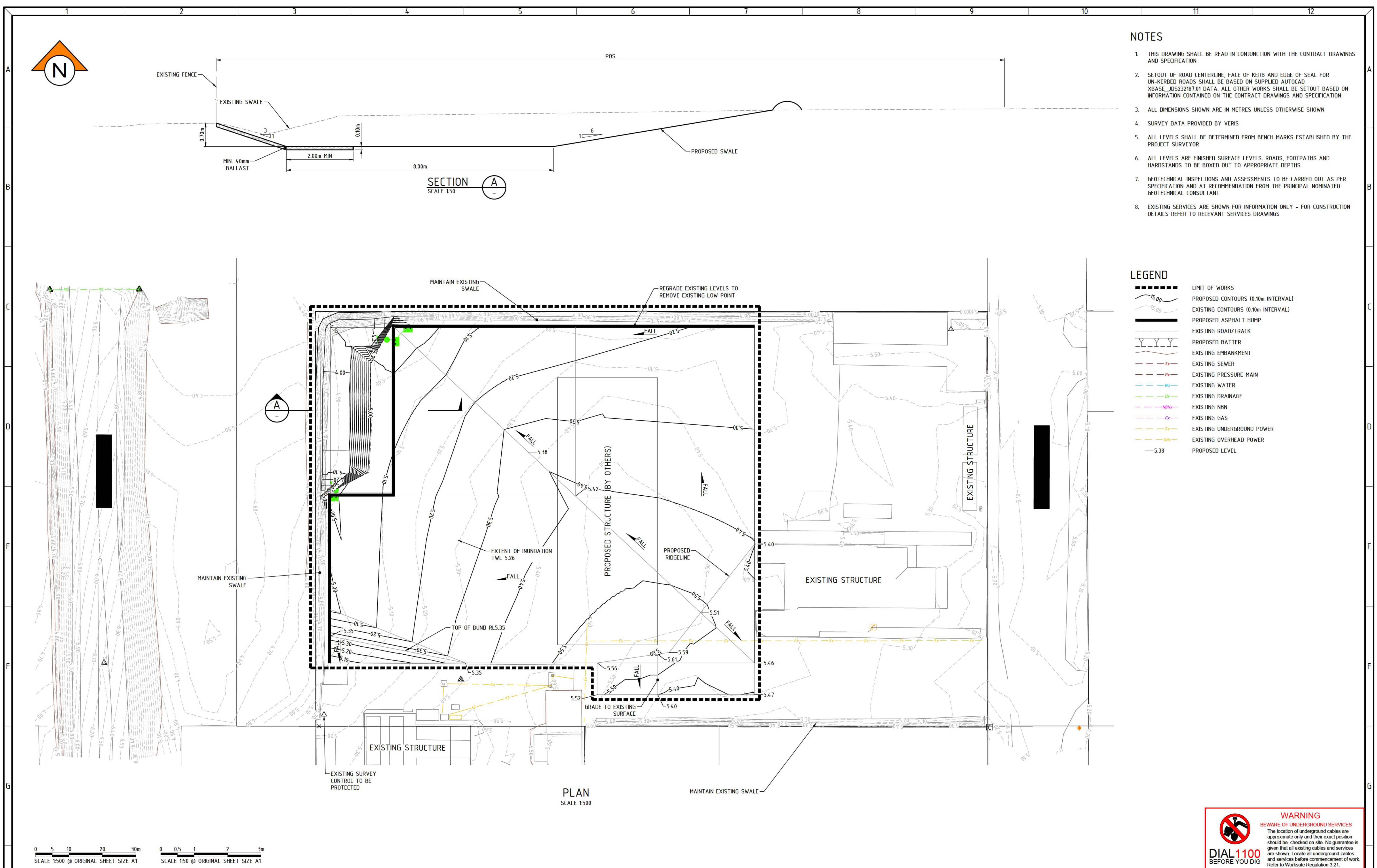
CONTOUR AND FEATURE SURVEY

Job No Item No Plan No Rev
635439 - 010 - 006 - 01
Sheet 1 of 1



Attachment 2

Development Plans



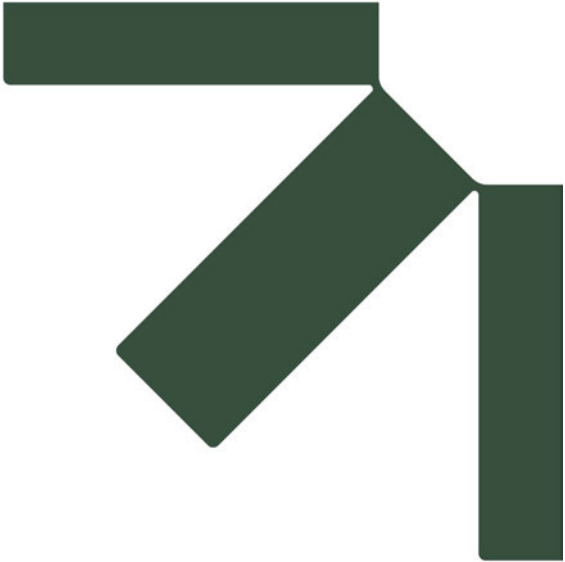
NOTES

1. THIS DRAWING SHALL BE READ IN CONJUNCTION WITH THE CONTRACT DRAWINGS AND SPECIFICATION
2. SETOUT OF ROAD CENTERLINE, FACE OF KERB AND EDGE OF SEAL FOR UN-KERBED ROADS SHALL BE BASED ON SUPPLIED AUTOCAD XBASE_JDS232187.01 DATA. ALL OTHER WORKS SHALL BE SETOUT BASED ON INFORMATION CONTAINED ON THE CONTRACT DRAWINGS AND SPECIFICATION
3. ALL DIMENSIONS SHOWN ARE IN METRES UNLESS OTHERWISE SHOWN
4. SURVEY DATA PROVIDED BY VERIS
5. ALL LEVELS SHALL BE DETERMINED FROM BENCH MARKS ESTABLISHED BY THE PROJECT SURVEYOR
6. ALL LEVELS ARE FINISHED SURFACE LEVELS. ROADS, FOOTPATHS AND HARDSTANDS TO BE BOXED OUT TO APPROPRIATE DEPTHS
7. GEOTECHNICAL INSPECTIONS AND ASSESSMENTS TO BE CARRIED OUT AS PER SPECIFICATION AND AT RECOMMENDATION FROM THE PRINCIPAL NOMINATED GEOTECHNICAL CONSULTANT
8. EXISTING SERVICES ARE SHOWN FOR INFORMATION ONLY - FOR CONSTRUCTION DETAILS REFER TO RELEVANT SERVICES DRAWINGS

LEGEND

- LIMIT OF WORKS
- - - - - PROPOSED CONTOURS (0.10m INTERVAL)
- - - - - EXISTING CONTOURS (0.10m INTERVAL)
- ===== PROPOSED ASPHALT HUMP
- - - - - EXISTING ROAD/TRACK
- - - - - PROPOSED BATTER
- - - - - EXISTING EMBANKMENT
- - - - - EXISTING SEWER
- - - - - EXISTING PRESSURE MAIN
- - - - - EXISTING WATER
- - - - - EXISTING DRAINAGE
- - - - - EXISTING NBN
- - - - - EXISTING GAS
- - - - - EXISTING UNDERGROUND POWER
- - - - - EXISTING OVERHEAD POWER
- - - - - PROPOSED LEVEL

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Attachment 8H

**Charges, Convictions, Penalties Paid for an Offence,
and/or Licences or other Authorisations Suspended or
Revoked**

30 May 2023

Department of Water and Environmental Regulation

By online submission –

Dear Sir or Madam

Works Approval for Tyrecycle Pty Ltd, Western Australia

As part of Tyrecycle's Works Approval application (the Application) for in Western Australia, Tyrecycle answered "Yes" to the following question:

- *Question 8.7: "If the applicant is a corporation, has any director of that corporation ever been a director of another corporation that has been convicted, or paid a penalty, for an offence under a provision of the EP Act, its subsidiary legislation, or similar environmental protection or health-related legislation in Western Australia or elsewhere in Australia?"*

By way of this letter, Tyrecycle seeks to provide further information in support of the Application and in respect of the above matter.

About Tyrecycle

1. Tyrecycle is a member of the ResourceCo Group of companies, a global leader in the recovery and re-manufacturing of primary resources. Established in early 1990s, the ResourceCo Group has grown to become a recognised pioneer in the resource recovery sector, operating over 20 sites in Australia and southeast Asia and employing over 900 staff. Founded on the principle of preserving natural resources for a sustainable future, the ResourceCo Group has already re-purposed over 60 million tonnes of materials making it the largest energy from waste producer in Australasia.
2. Tyrecycle is Australia's leader in tyre recycling with a national network of collection capabilities and seven dedicated processing facilities located across Australia including one in O'Connor, Western Australia. Tyrecycle collects end of life tyres and conveyor belts and recycles them through an advanced rubber re-manufacturing process, producing high quality repurposed material for the local and global market.
3. Tyrecycle's proposed East Rockingham site, which is the subject of the Application, will provide a new advanced manufacturing plant replacing our current aging facility in O'Connor. The proposed East Rockingham facility will receive, and process shredded off the road tyre (OTR) and conveyor belt from Tyrecycle's proposed Wedgefield facility, along with passenger, 4WD and truck tyres from all over Western Australia. These end of life tyres will be processed into 6-inch shred, 1.5-inch chip, and various sizes of crumb and granular products that will be used as tyre derived fuel (TDF), in road surfaces, sporting, playground and soft fall surfaces and tile adhesives.

In relation to the matters giving rise to the answer to question 8.7 of the Application, Tyrecycle discloses the following:

- a. In November 2006, the Environment Protection Authority of South Australia (**EPA SA**) alleged that ResourceCo (a member of the ResourceCo Group) breached its Environment Protection Licence 13997 (**EPL 13997**) and an Environment Protection Order was issued in respect of stockpile heights of raw and processed materials at its Wingfield site in South Australia. The material in question was inert and did not cause any environmental harm. ResourceCo was convicted and fined \$62,400 in the Environment, Resources and Development Court of South Australia.
- b. In May 2010, EPA SA alleged that ResourceCo breached an environment protection licence by disposing waste in onsite batters between March and August 2006. This matter was dealt with by way of a court agreed civil penalty ordered by the Environment, Resources and Development Court in the sum of \$133,000, plus \$17,000 in technical costs.
- c. In February 2016, the EPA SA alleged that ResourceCo breached its EPL 13997 by receiving commercial and industrial waste at its Wingfield site in South Australia that was not permitted under that licence. ResourceCo negotiated a civil penalty in respect of the alleged contravention in the sum of \$13,860.
- d. In 2017, the Environment Protection Authority of Victoria (**EPA Victoria**) issued proceedings against ResourceCo in relation to the transport of industrial waste to a facility not licensed to accept that type of waste. ResourceCo was fined \$150,000. In the circumstances of this matter, ResourceCo honestly but mistakenly relied upon an environmental consultant's report which incorrectly classified the material in question, resulting in the inadvertent transportation of the waste to the incorrect facility. ResourceCo staff have undertaken training with Greencap Environmental regarding the general environmental duty and waste classification guidelines in 2019. Further, additional environmental staff have since been employed and regular training on the ResourceCo waste acceptance procedures is undertaken for all staff who are responsible for waste classification and oversee the transport of reportable priority wastes.
- e. In early 2019, the Environment Protection Authority of NSW (**EPA NSW**) issued a notice to Cleanaway ResourceCo RRF Pty Ltd (**CRRRF**) in relation to the storage of Processed Engineered Fuel (**PEF**) bales outside of the designated area indicated on CRRRF's Environment Protection Licence 20937 (**EPL 20937**). CRRRF is a member the ResourceCo Group and manufactures PEF from recycled commercial, industrial, construction and demolition waste at its Resource Recovery Facility in Wetherill Park, New South Wales. At the time, CRRRF was experiencing high levels of stock on site due to extenuating circumstances outside of CRRRF's control. CRRRF was ultimately fined \$15,000 by EPA NSW.
- f. In late 2020, EPA NSW issued a notice to CRRRF in relation certain alleged instances of non-compliance with CRRRF's EPL concerning the storage of PEF bales, the management of waste material and the maintenance of plant and equipment. CRRRF respectfully disputed several of the instances of non-compliance but was ultimately fined \$15,000 by EPA NSW in relation to the storage of PEF bales. This matter arose in circumstances of the Covid-19 pandemic. At the time, CRRRF encountered prolonged delays to its shipping schedules at all levels of the supply

chain, which resulted in significant operational challenges, particularly around material flow and management at CRRRF's facility.

For completeness and notwithstanding this is not covered in the scope of question 8.7 of the Application, however, in the interests of full disclosure, Tyrecycle discloses the following:

- I. In March 2021, EPA Victoria invited Tyrecycle to respond to allegations that it had contravened certain conditions of its Environment Protection Licence 127315 (EPL 127315) in respect of its Somerton site concerning the dimensions of, and separation distances between, certain tyre piles. The non-compliance was in relation to working piles that were temporary and were in the process of being relocated after being offloaded from incoming trucks. ResourceCo was fined \$8,261 by EPA Victoria.
- II. In June 2021, EPA Victoria invited Tyrecycle to respond to an allegation that it had contravened a condition of EPL 127315 concerning the separation distances between various piles of whole tyres and shred tyres. The non-compliance arose during a period where Tyrecycle was facing difficulties exporting Tyre Derived Fuel and other products due to the global shortage of shipping containers caused by the Covid-19 pandemic. As a result, Tyrecycle was dealing with higher-than-normal volumes of tyres at the Somerton site. Insofar as the non-compliance related to piles of tyre shred, Tyrecycle respectfully disputed the non-compliance on the basis that EPL 127315 only regulated the storage of whole waste tyres, not tyre shred. Tyrecycle was ultimately fined \$8,261 by EPA Victoria.

In 30 years of operation across 20 sites in Australia, the fines set out above are the only instances where ResourceCo Group including Tyrecycle, has been penalised in respect of a Commonwealth, state or territory law.

Tyrecycle and the ResourceCo Group note that a number of the fines relate to historical matters that are no longer reflective of the sophisticated manner in which the business currently conducts its operations. Further, several of the recent fines arose in unprecedented circumstances and disruptions caused by the Covid-19 pandemic and, in some instances, a genuine misapprehension as to the application of the relevant environment protection licence.

Notwithstanding, ResourceCo Group including Tyrecycle understands that the industries it operates in are not without risks and appreciates that it has a responsibility as part of its social licence to operate to appropriately manage those risks. Tyrecycle and other entities within the ResourceCo Group have worked closely with the relevant environment protection authorities in Australia to implement mitigating measures and to ensure ongoing compliance at the various sites. These measures have ranged from conducting further training of employees in respect of licence conditions to making various adjustments to operational practices – i.e. installing signs identifying stockpile dimension limits, updating plans/risk assessments and working with relevant authorities to amend site stockpile limits.

Tyrecycle and the ResourceCo Group have been responsibly operating waste and resource recovery activities for 30 years and hold the expertise, environmental accreditation and social licence to continue advancing our resource recovery business and playing an important role in Australia's environmental and circular economy objectives.

Please contact the undersigned should you require any further information.

Yours faithfully

