



## Application for Licence Amendment

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

---

<b>Licence Number</b>	L7065/1997/11
<b>Licence Holder</b>	Shire of Carnarvon
<b>File Number</b>	DWERVT16042 and APP-0026161
<b>Premises</b>	<p>Brown Range Waste Facility</p> <p>227 Speedway Road</p> <p>BROWN RANGE WA 6701</p> <p>Legal description</p> <p>Part of Lot 531 on Deposited Plan 69587, and Lot 1210 on Deposited Plan 183666</p> <p>As defined by premises maps attached to the issued licence</p>
<b>Date of Report</b>	02 September 2025
<b>Decision</b>	Revised licence granted

## Table of Contents

<b>1. Decision summary .....</b>	<b>2</b>
<b>2. Scope of assessment .....</b>	<b>2</b>
2.1 Regulatory framework .....	2
2.2 Amendment summary .....	2
2.2.1 Liquid waste ponds .....	3
2.2.2 Premises location and land tenure .....	3
2.3 Amendment of Licence conditions .....	3
2.4 Environmental siting .....	5
2.4.1 Receptors.....	5
2.4.2 Topography.....	7
2.4.3 Hydrology and Groundwater.....	8
<b>3. Risk assessment.....</b>	<b>10</b>
3.1 Source-pathways and receptors .....	10
3.1.1 Emissions and controls .....	10
3.2 Risk ratings.....	12
3.3 Review of licence conditions.....	15
3.3.1 Infrastructure works.....	15
3.3.2 Groundwater bore works .....	15
<b>4. Consultation .....</b>	<b>16</b>
<b>5. Conclusion .....</b>	<b>16</b>
5.1 Summary of amendments.....	16
Table 1: Sensitive human and environmental receptors and distance from prescribed activity .....	5
Table 2: Licence holder controls .....	10
Table 3: Risk assessment of potential emissions and discharges from the premises during construction and operation .....	13
Table 4: Consultation .....	16
Table 5: Summary of licence amendments .....	16
Figure 1: Land tenure surrounding the premises .....	4
Figure 2: Distance to sensitive receptors.....	6
Figure 3: Topography of the area surrounding the premises .....	7
Figure 4: Graphical representation of aquifers surrounding Brown Range Waste Facility.....	8
Figure 5: Map of Carnarvon region showing the prescribed premises and L7065/1997/11 Brown Range Waste Facility in pink. General groundwater flow direction shown in blue. ....	9
Figure 6: Elevation cross section of point A to B (top panel) and point C to D (bottom panel). Location of prescribed premises L7065/1997/11 Brown Range Waste Facility shown in pink. Sourced from Google Earth 2025.....	10

## 1. Decision summary

Licence L7065/1997/11 is held by Shire of Carnarvon (licence holder) for the Brown Range Waste Facility (the premises), located at 227 Speedway Road, Brown Range WA.

This Amendment Report documents the assessment of potential risks to the environment and public health from proposed changes to the emissions and discharges during the operation of the premises. As a result of this assessment, revised licence L7065/1997/11 has been granted.

The revised licence issued as a result of this amendment consolidates and supersedes the existing licence previously granted in relation to the premises.

## 2. Scope of assessment

### 2.1 Regulatory framework

In completing the assessment documented in this Amendment Report, the department has considered and given due regard to its Regulatory Framework and relevant policy documents which are available at <https://dwer.wa.gov.au/regulatory-documents>.

### 2.2 Amendment summary

On 26 August 2024, the licence holder submitted an application to the department to amend licence L7065/1997/11 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). Brown Range Waste Facility is a Class II putrescible landfill and transfer station. The premises has liquid waste storage ponds and is licensed to store up to 1,000 tyres at any one time. Brown Range Waste Facility predominantly accepts residential waste from Carnarvon.

Crushing and screening activities and mulching of greenwaste is permitted on the current licence. Crushing activities fall below the licenced threshold of 1,000 tonnes per annual period for category 13 (crushing and screening of waste building or demolition material). The premises does not currently have mulching infrastructure on site.

In the Annual Audit Compliance Reports (AACRs) for 2022-2023 and 2023-2024 for the premises, the licence holder noted that it had accepted more than the licensed amount of liquid waste. In both years this was noted to be due to an increase in caravan/camping tourism and an increase in activity in the resources sector.

The licence holder advised in their amendment application that stockpiled greenwaste on site has self-ignited in the past. From discussions with the licence holder their transfer station activities have also changed since the last amendment of the licence.

The following amendments to the licence are being sought:

- Changing the annual reporting period to 1 July to 30 June;
- Increasing the liquid waste capacity from 1,478 tonnes to 3,000 tonnes per annual period;
- Approval to burn greenwaste on site to allow for controlled burning to reduce the risk of uncontrolled fires; and
- Updating category 62 solid waste acceptance to include; household hazardous waste including waste oil, paint and used batteries, white goods, scrap metal, and agricultural chemical containers under the drumMUSTER product stewardship program.

### 2.2.1 Liquid waste ponds

Brown Range Waste Facility has four clay lined liquid waste ponds in the south-east of the fenced premises area. The licence holder notes that these ponds are located at, or close to the top of a hill where stormwater ingress is minimal. The ponds are licensed to accept septage, sewage and grease trap waste which is transported to the premises and discharged to the ponds.

Only two ponds actively accept waste at any one time. The ponds not in use are periodically left to dry out before being dredged, cleaned and relined with clay. As of December 2024, the primary liquid waste pond has been dredged, enlarged and fresh clay lining has been applied. The clay lining consists of clay sourced from within the premises boundary; applied across the pond surface and compressed with an excavator. The licence holder considers the routine emptying, clearing and relining of the clay lined ponds to be routine maintenance operations rather than works.

### 2.2.2 Premises location and land tenure

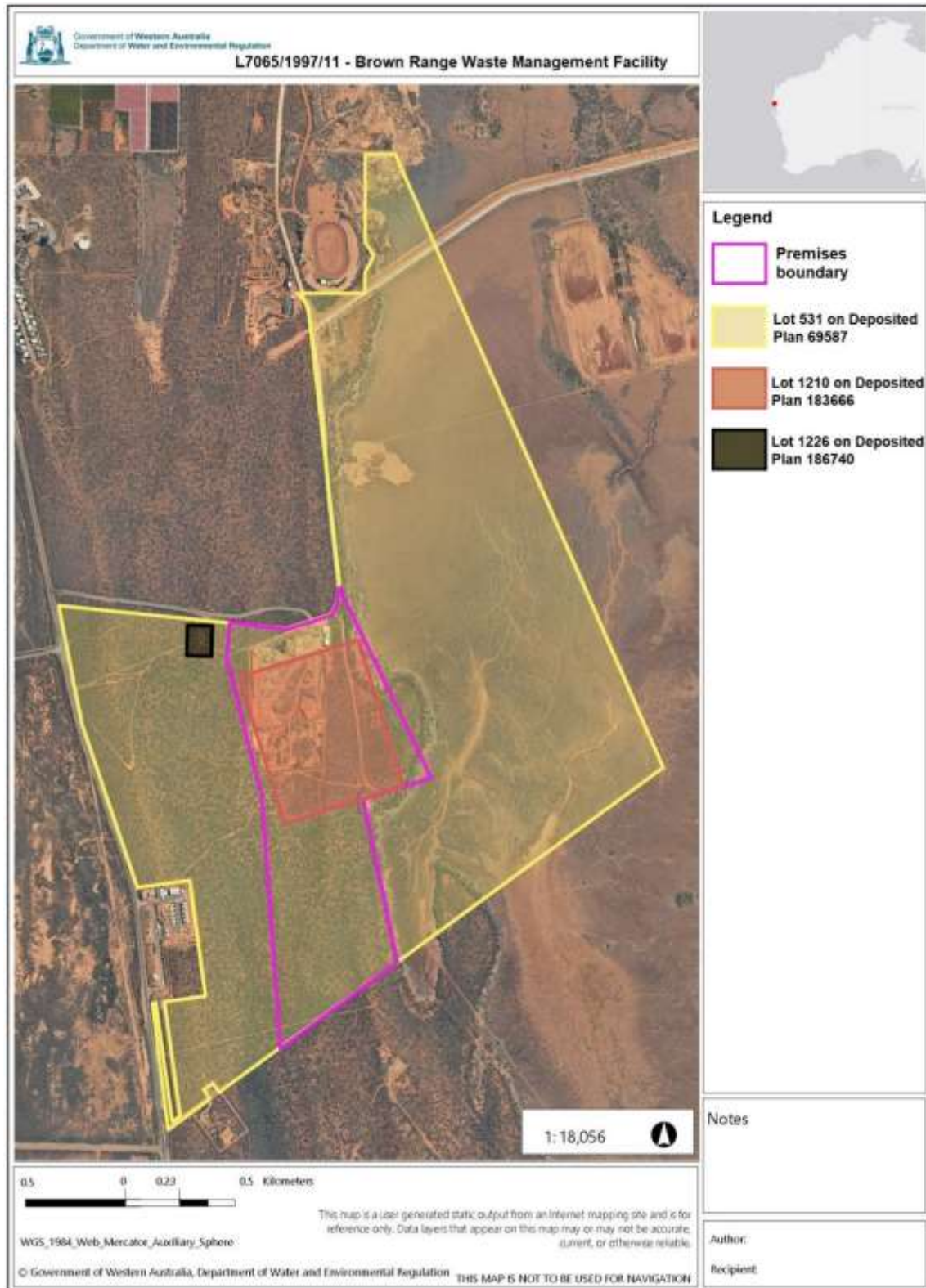
The current licence lists the premises location as “Lot 1210 on Plan 183666 and Lot 541 on Plan 69587”. Current mapping data shows that the lot numbers have changed. The Department of Lands and Heritage (DPLH) was consulted to confirm that the Shire of Carnarvon has approval to operate on Lot 531 on Deposited Plan 69587 and Lot 1210 on Deposited Plan 183666 (shown below in Figure 1). DPLH has informed the licence holder that Lot 1210 on Deposited Plan 183666 (Reserve 36467) requires a change of purpose to make it consistent with its current use as well as expand the size of the reserve to accommodate the premises boundaries.

## 2.3 Amendment of Licence conditions

The obligations of the licence holder have not changed in amending the licence. In amending the licence, the CEO has:

- updated the format and appearance of the licence;
- deleted the redundant AACR form set out in schedule 1 of the previous licence and advise the licence holder to obtain the form from the department’s website;
- revised licence condition’s numbers, removed any redundant conditions and realigned condition numbers for numerical consistency; and
- corrected clerical mistakes and unintentional errors.

The full amendment of licence conditions as they relate to this revised licence are detailed in Section 5.1.



**Figure 1: Land tenure surrounding the premises**

## 2.4 Environmental siting

### 2.4.1 Receptors

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

Table 1 below provides a summary of potential human and environmental receptors that may be impacted as a result of activities upon or emission and discharges from the prescribed premises (*Guideline: Environmental siting* (DWER 2020)).

**Table 1: Sensitive human and environmental receptors and distance from prescribed activity**

Human receptors	Distance from prescribed activity
Residential Premises	<ul style="list-style-type: none"> <li>900 m west of premises boundary</li> <li>1.1 km north-west of the premises boundary</li> </ul>
Industrial premises	<ul style="list-style-type: none"> <li>Regional power corporation (power station) – 270 m west of premises boundary</li> </ul>
Groundwater licence GWL50787 – Carnarvon Speedway Club (Inc.)	<ul style="list-style-type: none"> <li>1.3 km north of premises boundary</li> </ul>
Environmental receptors	Distance from prescribed activity
Native vegetation	<ul style="list-style-type: none"> <li>Within and directly around the premises boundary</li> </ul>
Threatened fauna	<ul style="list-style-type: none"> <li>Two protected bird species observed within the premises boundary</li> <li>23 protected bird species observed within a 1 km radius of the premises boundary</li> </ul>
Important Wetlands	<ul style="list-style-type: none"> <li>McNeill Claypan System along the eastern boundary of the premises</li> </ul> <p>The McNeill Claypan system is one of the largest shrub swamps in the north-west of Australia (DCCEEW 1995). The McNeill Claypan may fill every five to ten years with the majority of rainfall occurring in May-June; average yearly rainfall of 227 mm.</p> <p>The McNeill Claypan System crosses into the premises boundary on the northern corner and is directly adjacent to the premises southern boundary (Figure 2). It is noted that the active area of the premises does not cross into the McNeill Claypan system.</p>
RIWI Act – Groundwater Areas RIWI Act – Surface Water Areas and Irrigation Districts	<ul style="list-style-type: none"> <li>Located in the Gascoyne Groundwater Area</li> <li>Surface waterbodies 'McNeil Claypan', within and along the eastern boundary of the premises</li> <li>Surface waterlines – Minor; running north-south 650 m east of the premises boundary</li> <li>Gascoyne River and Tributaries 2.8 km north of premises</li> </ul>



	<p>boundary</p> <ul style="list-style-type: none"> <li>Groundwater 8.8 m bgl to 19.5 m bgl</li> </ul>
--	---



**Figure 2: Distance to sensitive receptors**

### 2.4.2 Topography

The topography of the area surrounding the premises shows the premises area is slightly raised above the McNeill Claypan system. Groundwater contour data is not available for the Carnarvon area.



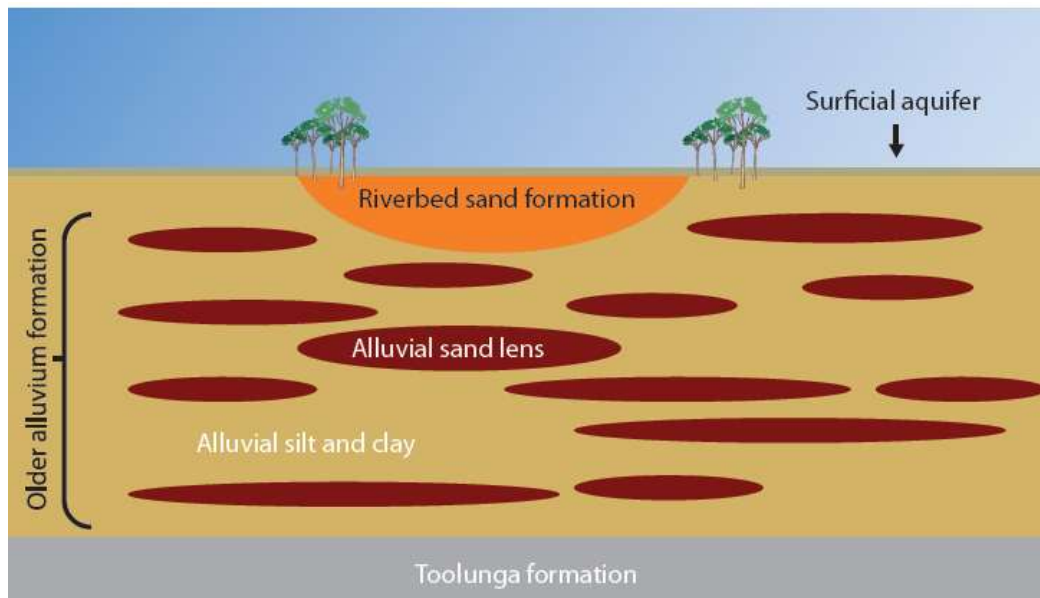
**Figure 3: Topography of the area surrounding the premises**



### 2.4.3 Hydrology and Groundwater

Standing water level readings provided in the 2022-2023 Annual Audit Compliance Report in May 2023 indicate depth to groundwater varies from 8.8 m bgl to 19.5 m bgl at the premises. From groundwater bore readings, the licence holder reports groundwater flow is in a north-west direction; away from the McNeill Claypan System and the Gascoyne river.

The area comprises of two main aquifers: the Lower Gascoyne Alluvial Aquifer, which consists of riverbed sands and lenses, and the Surficial Aquifer located in the immediate surroundings of the Gascoyne river. These aquifers are hydraulically connected.



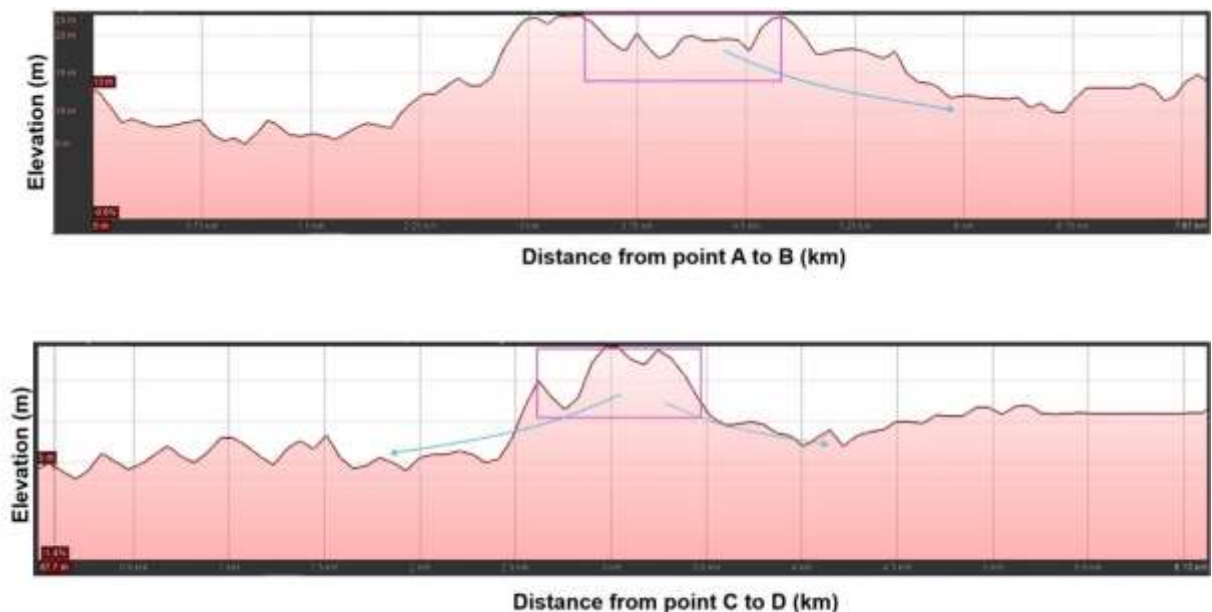
**Figure 4: Graphical representation of aquifers surrounding Brown Range Waste Facility**



**Figure 5: Map of Carnarvon region showing the prescribed premises and L7065/1997/11 Brown Range Waste Facility in pink. General groundwater flow direction shown in blue.**

The general direction of groundwater flow is from the elevated terrain in the east towards the Indian Ocean — that is, in a westerly to north-westerly direction — following the axis of the Gascoyne River, where the main alluvial aquifer is situated.

Private bores, concentrated within the river zone (the Carnarvon Horticulture District or CHD bores), create a cone of depression, resulting in a hydraulic gradient towards the river axis, which lies to the north of the designated site (red line).



**Figure 6: Elevation cross section of point A to B (top panel) and point C to D (bottom panel). Location of prescribed premises L7065/1997/11 Brown Range Waste Facility shown in pink. Sourced from Google Earth 2025.**

The premises is located on elevated ground compared to surrounding areas. Therefore, considering that the waste-impacted zone is more influenced by the surficial sediments and local topography, the local groundwater flow is expected to be predominantly towards the north-northwest (NNW) and west (solid blue arrows). A less significant easterly component of flow towards the nearby claypan is also anticipated (dashed blue arrow).

### 3. Risk assessment

The department assesses the risks of emissions from prescribed premises and identifies the potential source, pathway and impact to receptors in accordance with the *Guideline: Risk assessments* (DWER 2020).

To establish a Risk Event there must be an emission, a receptor which may be exposed to that emission through an identified actual or likely pathway, and a potential adverse effect to the receptor from exposure to that emission.

#### 3.1 Source-pathways and receptors

##### 3.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during premises operation which have been considered in this Amendment Report are detailed in Table 2 below. Table 2 also details the proposed control measures the licence holder has proposed to assist in controlling these emissions, where necessary.

**Table 2: Licence holder controls**

Emission	Sources	Potential pathways	Proposed controls
Dust	Solid waste acceptance and storage	Air/windborne pathway	No new controls proposed
Noise	Solid waste acceptance and storage	Air/windborne pathway	No new controls proposed
Fire / smoke	Burning of greenwaste	Air/windborne pathway	No new controls proposed
Firefighting wash-water	Burning of greenwaste	Seepage to soils and groundwater  Overland runoff	No new controls proposed
Odour	Liquid waste acceptance and storage	Air/windborne pathway	No new controls proposed
Sewage,	Potential spills	Seepage to	No new controls proposed

Emission	Sources	Potential pathways	Proposed controls
septage grease waste	and/or leakage of waste during storage and handling	soils and groundwater  Overland runoff	
Contaminated stormwater	Liquid waste acceptance and storage  Potential spills and/or leakage of waste during storage and handling  Solid waste acceptance and storage	Seepage to soils and groundwater  Overland runoff	<ul style="list-style-type: none"> <li>Natural bunding with minimal stormwater ingress</li> </ul>
Leachate	Liquid waste acceptance and storage	Seepage to soils and groundwater  Overland runoff	<ul style="list-style-type: none"> <li>Natural bunding with minimal stormwater ingress</li> <li>Routine drying and clearing of liquid waste storage ponds</li> <li>Relining of clay of the liquid waste storage ponds after drying and clearing</li> <li>Alternating liquid waste storage between 2 sets of 2 ponds as required (4 liquid waste storage ponds on the premises)</li> <li>Trapped overflow has been repaired</li> <li>Freeboard maintained</li> </ul>

## 3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for those emission sources which are proposed to change and takes into account potential source-pathway and receptor linkages as identified in Section 3.1. Where linkages are incomplete they have not been considered further in the risk assessment.

Where the licence holder has proposed mitigation measures/controls (as detailed in Section 3.1), these have been considered when determining the final risk rating. Where the delegated officer considers the licence holder's proposed controls to be critical to maintaining an acceptable level of risk, these will be incorporated into the licence as regulatory controls.

Additional regulatory controls may be imposed where the licence holder's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 3.

The revised licence L7065/1997/11 that accompanies this amendment report authorises emissions associated with the operation of the premises i.e. category 57; used tyre storage, category 61; liquid waste facility, category 62; solid waste depot and category 64; putrescible landfill site activities.

The conditions in the revised licence have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).



Table 3. Risk assessment of potential emissions and discharges from the premises during construction and operation

Risk Event					Risk rating <sup>1</sup> C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions <sup>2</sup> of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
Operation								
Acceptance and storage of liquid waste  Acceptance and storage of household hazardous waste (paints, waste hydrocarbons and used batteries)  Spills and/or leakage of waste during storage and handling	Dust	<b>Pathway</b> Air/windborne <b>Impact:</b> Health and amenity	<ul style="list-style-type: none"><li>Regional power corporation (power station) – 270 m west of premises boundary</li><li>Residences 900 m west and 1.1 km north-west of premises boundary</li></ul>	Refer to Section 3.1.1	C= Minor L = Possible <b>Medium Risk</b>	N	<b><u>Condition 23</u></b>	The delegated officer has added a standard dust control to the licence.
	Odour	<b>Pathway</b> Air/windborne <b>Impact:</b> Health and amenity	<ul style="list-style-type: none"><li>Regional power corporation (power station) – 270 m west of premises boundary</li><li>Residences 900 m west and 1.1 km north-west of premises boundary</li></ul>	Refer to Section 3.1.1	C = Minor L = Rare <b>Low Risk</b>	Y	No additional controls proposed	The delegated officer notes that no odour complaints have been received regarding the premises operation.
	Leachate Contaminated stormwater Septage, sewage and grease waste	<b>Pathway</b> Overland flow and subsurface seepage <b>Impact:</b> Soil and groundwater quality	<ul style="list-style-type: none"><li>McNeill Claypan system east of premises boundary</li><li>Native vegetation within and surrounding the premises boundary</li><li>Two protected bird species observed within the premises boundary</li><li>21 protected bird species east of the premises boundary</li></ul>	Refer to Section 3.1.1	C= Moderate L= Possible <b>Medium Risk</b>	N	Condition 1 <b><u>Conditions 2, 3, 4, 8, 30</u></b>	Overland run off from over topping to the McNeill Claypan system has the potential to impact species habitat. Current licence conditions are considered adequate to manage this risk with requirements to maintain a minimum 300 mm freeboard on the ponds.  The last licence amendment was in 2017, as such ambient groundwater monitoring parameters have been updated to reflect more contemporary groundwater monitoring requirements. The delegated officer also notes that as the liquid waste storage ponds are clay-lined, routine cleaning of the ponds is likely to disturb the clay-lining. The delegated officer has strengthened the applicant conditions regarding the routine cleaning and clay-relining of the ponds. Requirements for the clay liner have also been conditioned specifying the minimum thickness of the pond liner and minimum permeability (condition 1) to minimize infiltration to soil and groundwater. Compliance reporting has been conditioned when pond maintenance works occur (conditions 2 and 3).
Burning of greenwaste	Smoke, odour, fire	<b>Pathway</b> Air/windborne <b>Impact:</b> Health and amenity	<ul style="list-style-type: none"><li>Native vegetation within and surrounding the premises</li><li>Two protected bird species observed within the premises boundary</li><li>21 protected bird species east of the premises boundary</li><li>Regional power corporation (power station) – 270 m west of premises boundary</li><li>Residences 900 m west and 1.1 km north-west of premises boundary</li></ul>	Refer to Section 3.1.1	C = Major L = Unlikely <b>Medium Risk</b>	N	<b><u>Condition 8</u></b>	The delegated officer notes the proximity to native vegetation within and surrounding the premises. A review of the department's Incidents and Complaints Management System and submitted AACRs confirms reports of spontaneous greenwaste fires on the premises. Standard greenwaste burning conditions have been added to the licence instructing the preparation and burning requirements.
	Firefighting wash-water Contaminated	<b>Pathway</b> Overland flow and subsurface	<ul style="list-style-type: none"><li>Native vegetation within and surrounding the premises</li><li>McNeill Claypan system east of premises boundary</li></ul>	Refer to Section 3.1.1	C= Major L= Unlikely	N	<b><u>Conditions 8, 22</u></b>	Standard greenwaste burning conditions have been added to the licence under condition 8 to regulate the management of fires and contamination in the greenwaste stockpile. Condition 22 has been expanded to regulate the

Risk Event					Risk rating <sup>1</sup> C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions <sup>2</sup> of licence	Justification for additional regulatory controls
Source/Activities	Potential emission	Potential pathways and impact	Receptors	Licence Holder's controls				
	stormwater	seepage <b>Impact:</b> Soil and groundwater quality			Medium Risk			keeping of fire-fighting wash-waters on the premises.

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

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

### 3.3 Review of licence conditions

#### 3.3.1 Infrastructure works

The installation and operation of a crusher, green waste shredder and baler was assessed by the former Department of Environment and Conservation on 5 January 2017 and risk mitigation conditions were applied to the licence.

The licence holder advised the Wastech Engineering Bramidan baler has been installed and is operational. The operation of the baler has not modified the risk profile from the 2017 assessment, therefore this item will not be reassessed under this application. Existing licence conditions have been reviewed as part of this amendment against current operating procedures to ensure accuracy of the regulatory controls. The delegated officer has determined that existing conditions are satisfactory to mitigate the risk of noise.

The licence holder advised a stand-alone crusher was not installed as the Excavator Caterpillar 320GC includes a crushing attachment. Operation of the crushing attachment does not modify the risk profile from the 2017 assessment, therefore this item will not be reassessed under this application. Existing licence conditions have been reviewed as part of this amendment against current operating procedures to ensure accuracy of the regulatory controls. Crushing and screening conditions have been updated to the current licensing format noting visual inspection requirements of C&D waste and processing requirements for crushing and screening (condition 6). Schedules 2, 3 and 4 have been added to the licence to inform asbestos risk classification, provide a high-risk load procedure, and asbestos monitoring and testing requirements. The delegated officer has determined that these updated conditions are sufficient to mitigate the risk of potential emissions of asbestos, dust and noise. A process limit of no more than 1,000 tonnes has been conditioned to ensure the activity remains below the category 13; crushing and screening licensing threshold.

The licence holder advised the green waste shredder was not installed, however there is a long-term view to commence greenwaste shredding activities via a mobile contractor. The future use of a greenwaste shredder does not modify the risk profile from the 2017 assessment, therefore this item will not be reassessed under this application. Existing licence conditions have been reviewed as part of this amendment against potential operating procedures to facilitate this activity occurring in future. The delegated officer has determined that signage requirements for mulch users are required and have been added under condition 6. A process limit of no more than 1,000 tonnes has been conditioned to ensure the activity remains below the category 61A licensing threshold.

#### 3.3.2 Groundwater bore works

Improvement condition 3.1.1 on the current licence requires that groundwater directional flow is to be determined by the 31 March 2017, and ensure that there is at least one monitoring bore upstream and two downstream of the premises. Groundwater directional flow was required to assess potential impacts to groundwater from the landfill.

The licence holder advised in the Annual Environmental Report (2022-2023) that the two existing bores (North - GW 1 and South – GW 2) were redrilled, and a third bore (West – GW 3) was drilled in April 2023. The licence holder has determined the groundwater flow direction being to the north-west.

In light of this work, existing licence conditions have been reviewed as part of this amendment to ensure accuracy of the regulatory controls. The delegated officer has determined that the list of parameters to be monitored under the existing licence conditions are insufficient to provide an accurate representation of impacts to groundwater, therefore the suite of parameters has been expanded.

## 4. Consultation

Table 4 provides a summary of the consultation undertaken by the department.

**Table 4: Consultation**

Consultation method	Comments received	Department response
Licence Holder was provided with draft amendment on 16 May 2025.	Comments provided on 22 July 2025 and additional time was requested by the Shire to provide further comments on 06 August 2025.	See appendix 1.
Department of Planning, Lands and Heritage contacted for comment on 22 November 2024.	Licence holder received comment from DPLH on 20 November 2024 regarding expanding Lot 1210 (Reserve 36467) on Deposited Plan 183666 to allow for current operations. DPLH has noted <i>“in order to extend the boundaries of the current Reserve 36467, the Shire would need to enter into an indigenous land use agreement (ILUA) with the registered native title body corporate (RNTBC), in this case the Yinggarda Aboriginal Corporation (YAC) in order to extend the Reserve’s boundaries.”</i> DPLH also notes that the current use of Reserve 36467 “Waste Management Facility” is inconsistent with the reserves purpose and requires changing. DPLH notes both these processes can be commenced by DPLH with a written request from the licence holder.	The department has reiterated DPLH’s comments to the licence holder.

## 5. Conclusion

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

### 5.1 Summary of amendments

Table 5 provides a summary of the proposed amendments and will act as record of implemented changes. All proposed changes have been incorporated into the revised licence as part of the amendment process.

**Table 5: Summary of licence amendments**

Revised condition no.	Condition description	Previous condition no.	Proposed amendments
Cover page	Licence overview	Cover page	<p>Increase of category 61: liquid waste facility throughput to 3,000 tonnes per annual period as requested.</p> <p>Aligned the licence expiry date with the annual fee anniversary date to be 06/11/2034.</p>

Revised condition no.	Condition description	Previous condition no.	Proposed amendments
			Amended premises name. Revised legal description to current Lot number.
Interpretation	Interpretation	1.1.1	Redundant condition. Revised to current licensing format.
N/A Interpretation section.	Australian or other standard	1.1.3	Redundant condition. Revised to current licensing format.
N/A Interpretation section.	Reference to code of practice	1.1.4	Redundant condition. Revised to current licensing format.
N/A	General conditions Pollution control and monitoring equipment	1.2 1.2.1	Redundant condition. Adequately covered by alternative existing conditions. Deleted from licence.
N/A	Proposed works	1.2.3	Redundant condition, no works proposed.
	Departures from proposed works	1.2.5	
	Construction compliance document submission Construction compliance document	1.2.6 1.2.7	Redundant condition, no works proposed.
Condition 1 Table 1	Waste processing	1.3.3 Table 1.3.2	Infrastructure fixture conditions moved to infrastructure table as per current licensing format.
	Construction conditions	1.2.4 Table 1.2.1	The crusher, chipper and baler plants have been installed, therefore they have been moved to the infrastructure and equipment table, Table 2. Condition now redundant as no works are proposed, removed from licence.
	Security measures (fencing)	1.3.6	Incorporated without change into row 5 of Table 1.
	Signage	1.3.7	Incorporated without change into row 4 of Table 1.



Revised condition no.	Condition description	Previous condition no.	Proposed amendments
	Management of liquid waste ponds	1.3.9	Incorporated without change into row 6 of Table 1.  Added liquid waste pond liner requirements. Updated liquid waste pond operational requirements to include maintenance procedures.
	Groundwater monitoring bores	N/A	Added requirements for maintaining the groundwater monitoring bores.  Added reference to Figure 3, Schedule 1, location of groundwater monitoring bores.
Condition 2	Environmental compliance report	N/A	Added compliance reporting for the liquid pond maintenance works.
Condition 3	Environmental compliance report requirements	N/A	Added compliance reporting requirements for the liquid pond maintenance works.
Condition 4 Table 2	Waste acceptance	1.3.1 Table 1.3.1	Addition of category 62 solid waste types; scrap metal, car bodies, white goods, and hazardous waste to waste acceptance.  Increased liquid waste acceptance capacity to 3,000 tonnes per annual period.  Removed waste codes and revised to current licensing format.
Condition 5	Non-acceptance of waste	1.3.2	Updated and revised condition to current licensing format.
Condition 6	Signed declaration of inert waste type 1 (accepted for the purposes of crushing and screening)	N/A	Added to licence as standard conditions as per current licensing standards for crushing and screening.
Condition 7	Inspection of C&D loads	2.3.1	Reworded and revised condition to be in line with current crushing and screening licensing standards.
	Maintaining records of inspection of accepted C&D loads	2.3.5	
Condition 8 Table 3	Waste processing and storage	1.3.3 Table 1.3.2	Addition of burning of greenwaste to waste processing.  Addition of category 62 solid waste types to

Revised condition no.	Condition description	Previous condition no.	Proposed amendments
			<p>waste processing and storage.</p> <p>Revised to current licensing format. Updated crushing and screening, and mulching processing conditions to current licensing standards.</p> <p>Updated tyre storage requirements as per current licensing standards and referencing <i>Department of Fire &amp; Emergency Services Guidance Note 02: Bulk storage of rubber tyres including shredded and crumbed tyres.</i></p>
	Storage of C&D waste material for processing	2.3.7	Reworded and revised condition to be in line with current crushing and screening licensing standards. Incorporated into Table 3, recycled material storage.
Condition 9	Storage of C&D waste	N/A	Added condition to be in line with current crushing and screening licensing standards.
Condition 10	C&D load contains asbestos or ACM	2.3.2	Reworded and revised condition to be in line with current crushing and screening licensing standards.
Condition 11	Dampening of C&D loads	2.3.3	Reworded and revised condition to be in line with current crushing and screening licensing standards.
Condition 12	Classification of high risk loads	2.3.4	Revised to reference Schedule 3.
Condition 13	Continual visual inspection of C&D waste	2.3.6	Reworded and revised condition to be in line with current crushing and screening licensing standards.
Condition 14	Storage of processed and unprocessed recycled material	2.3.7	Reworded and revised condition to be in line with current crushing and screening licensing standards.
Condition 15	Reduced sampling criteria	N/A	Added condition to be in line with current crushing and screening licensing standards.
Condition 16	Recycled material monitoring	1.3.12 2.3.8	Updated crushing and screening of recycled material monitoring to current licensing standards. Supported by Schedule 4.
Condition 17	Supply of recycled material to customers	2.3.9	Reworded and revised condition to be in line with current crushing and screening licensing standards.

Revised condition no.	Condition description	Previous condition no.	Proposed amendments
Condition 18	Retention of asbestos testing records	2.3.10	Reworded and revised condition to be in line with current crushing and screening licensing standards.
Condition 19	Landfilling activities	N/A	Revised to current licensing format. Relevant conditions taken from waste processing table 1.3.2.
Condition 20 Table 4	Cover requirements	1.3.4 Table 1.3.3	Reordered condition.
Condition 21 Table 5	Capping requirements	1.3.5 Table 1.3.4	Revised wording as per current licensing format.
Condition 22	Fire management	1.3.11	Addition of management of firefighting wash waters due to the burning of greenwaste. Reordered and revised as per current licensing format.
Condition 23	Wetting down unsealed roads	N/A	Standard outcome based dust control added.
Condition 24	Vermin and pest management	1.3.8	Reordered condition.
Condition 25	Spills of waste	1.2.2	Reordered and revised as per current licensing format.
Condition 26	Windblown waste	1.3.10	Reordered condition.
Condition 27	Water sample monitoring	2.1 2.1.1	Reordered condition.
Condition 28	Minimum interval for groundwater monitoring samples	2.1.2	Reordered condition.
Condition 29	Calibration of water monitoring equipment	2.1.3	Reordered condition.
Condition 30 Table 6	Monitoring of ambient groundwater quality	2.4.1 Table 2.4.1	Updated groundwater monitoring quality parameters to be in line with contemporary groundwater monitoring requirements.  Added field parameters; "dissolved oxygen", "oxidation/reduction potential", "temperature"  Laboratory parameters; "biological oxygen demand", "Ca", "N", "Cl", "SO <sub>4</sub> ",

Revised condition no.	Condition description	Previous condition no.	Proposed amendments
			"bicarbonate", "carbonate", "Nitrite", "Arsenic", "Aluminium", "Boron", "Barium", "Cobalt", "Chromium VI", "Molybdenum", "Selenium", "Vanadium", "E.coli".
Condition 31 Table 7	Monitoring of inputs and outputs	2.2.1 Table 2.2.1	Removed parameter column, replaced by Waste Type column. Added in recycled material to output monitoring.  Removed averaging period column.
N/A	Improvement program	3.1 3.1.1 Table 3.1.1	Comments by the licence holder in the submitted Annual Audit Compliance Report from 2022-2023 address this requirement, thereby making the condition redundant. Condition deleted.
Condition 32	Complaints	4.1.3	Reordered and revised as per current licensing format.
Condition 33	Records of Special Waste Type 1 and Special Waste Type 2 disposal	4.1.4	Revised to current licensing standards. 4.1.1 Incorporated into this condition.
Condition 34	Record – keeping of information	4.1 4.1.1	Reordered and revised as per current licensing format.
Condition 35	Non-annual reporting requirements	4.2.2 Table 4.2.2	Revised to current licensing format. Condition updated to include the reporting of fire-fighting wash waters.
Condition 36	Annual Audit Compliance Report	4.1.2	Revised to current licensing format. And revised date in accordance with Amendment of licence reporting (requirements 13/05/2022).  Revised Annual Audit Compliance Report due date to 30 August.
	Notification to the CEO	4.3.1 Table 4.3.1	Covered by Annual Environmental Reporting requirements.
Condition 37 Table 8	Maintaining records of inspection of accepted C&D loads	2.3.5	Reworded and revised condition to be in line with current crushing and screening licensing standards.  Included in Environmental report requirements.
	Environmental Reporting requirements	4.2 4.2.1 Table 4.2.1	Adjusted reporting requirement frequency as per Amendment of licence reporting (requirements 13/05/2022).

Revised condition no.	Condition description	Previous condition no.	Proposed amendments
			Revised to include relevant reporting requirements of crushing and screening activities.  Revised environmental report due date to the 30 August 2025 and biennially thereafter.
Definitions Table 9	Definitions	1.1.2	Revised to current licensing format, moved to end of licence.
			Definitions added; "AHD", "Approved form", "AS 4454", "Clean Fill", "Condition", "Construction and demolition waste (C & D waste)" and "premises"
			Definitions removed; "Act" and "fugitive emissions".
Schedule 1: Maps	Premises maps	Schedule 1: Maps	Updated Figure 1 to contemporary image of premises.  Added Figure 2 – map of the layout of the prescribed premises  Added Figure 3 –location of groundwater monitoring bores
Schedule 2	Asbestos load risk classification procedure	Attachment 1	Revised schedule to current crushing and screening of C&D waste procedure.
Schedule 3	High risk load procedure	Attachment 2	Revised schedule to current crushing and screening of C&D waste high risk load procedure.
Schedule 4	Recycled output contamination limit	1.3.12	Updated crushing and screening of and recycled material monitoring to current licensing standards.
	Asbestos monitoring and testing	Attachment 3	Revised schedule to current asbestos monitoring and testing procedure.
N/A	Notification form	Schedule 2 Table 11	Removed. Notification form available on the department's website.
N/A	Decision report supporting licence conditions	Decision report document	Removed from licence. The decision report is a separate document to the licence and is available on the department's website once the licence has been granted.



## References

1. Department of Climate Change, Energy, the Environment and Water (DCCEEW) 1995 [\*Directory of Important Wetlands in Australia – Information Sheet\*](#), DCCEEW, accessed 20 March 2025.
2. Department of Climate Change, Energy, the Environment and Water (DCCEEW) 2025 [\*EPBC Act Migratory Species List\*](#), DCCEEW, accessed 20 March 2025.
3. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
4. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
5. Department of Water and Environmental Regulation (DWER) 2022, *Guideline: Better practice organics recycling*, Perth, Western Australia.
6. DWER 2020, *Guideline: Risk Assessments*, Perth, Western Australia.

## Appendix 1: Summary of licence holder's comments on risk assessment and draft conditions

Condition	Summary of licence holder's comment	Department's response
Condition 1, Table 1	The 4th Bore is not required. The flow is to the North West. The site is on an ancient, elevated sand dune with impervious underlying clay. Not withstanding the identified floodplain, Carnarvon receives in a 'good year' only 180mm rain (average) and this floodplain drains quickly and exits due to alluvial impervious clay. So it is not reasonably deemed a concern. Inspection on site show the potential for the McNeill Claypan being affected as nil as the bunds are high, the contours would direct all potential spills into the landfill site area, nowhere else. The volume increase is nominal only and is not representative of a large volume of liquid waste. The liquid waste is sewage only including cooking fats and greases from commercial cooking facilities. The sewage is 98.4% water (H <sub>2</sub> O), 0.8% is organic and 0.8% is inorganic. Consequently, to require a 4th bore for monitoring the "increase" is not required. Furthermore, the existing 3 bores have not revealed any concerns for the history of this site which is testament to the effectiveness of the existing capacity resilience. A 4th bore is deemed redundant.	<p>Further hydrology and groundwater information has been added to the decision report (refer to Section 2.4.3). As noted, the majority of groundwater flow is north-westerly away from the claypan, with a lesser extent of flow being easterly towards the claypan system.</p> <p>The requirement for construction for the additional groundwater monitoring bore, and related conditions, have been removed.</p> <p>The delegated officer has instead strengthened the conditions around the lining of the ponds (compliance reporting conditions 2 and 3) to ensure that the permeability of the ponds is maintained.</p>
Condition 2	Disagreed. 4 <sup>th</sup> Bore not required.	The requirement for a fourth bore has been removed.
Condition 3	Currently the ponds are re-lined every 5 years. The current 5 years have proven to be adequate with no adverse effects on the environment observed. The requirement to reline every 3 years is deemed excessive for costs and labour.	<p>This condition has been updated as requested.</p> <p>The delegated officer has further conditioned compliance reporting for pond maintenance (conditions 2 and 3)</p> <p>Permeability requirements (permeability of 1x10<sup>-9</sup> m/s or less) are also conditioned to manage the risk of leachate (condition 1).</p>
Condition 5	Can condition 5(b) be amended: delete "...within seven days of receipt." And insert 'without undue delay, subject to obtaining any required approval.'. See Attachments A and B for details.	This request has been accepted and the delegated officer notes the remote location of the landfill. Wording has been changed to "as soon as practicable"
Condition 8, Table 4 Special Waste Type 1 (asbestos waste)	Special waste type 1 (asbestos waste) Asbestos waste to be recorded as soon as practicable having regard to operational circumstances. The requirement "to be recorded in the asbestos register within 2 hours of burial" places undue pressure on record keeping over safety procedures.	This condition was carried over from the previous version of the licence so is not a new requirement. This is a standard condition which comes from the <i>Environmental Protection (Rural Landfill) Regulations 2002</i> . Noting the Shires concerns with record keeping and safety the delegated officer has amended the condition to require the register be filled in by the end of the working day.
Condition 8, Table 4, Septage wastes (including waste from sewage systems)	Currently the ponds are re-lined every 5 years. The current 5 years have proven to be adequate with no adverse effects on the environment observed. The requirement to reline every 3 years is deemed excessive	<p>The delegated officer accepts this request.</p> <p>This condition has been moved from waste processing to operational requirements of the ponds in condition 1, Table 1.</p>

Licence: L7065/1997/11

Condition	Summary of licence holder's comment	Department's response
and grease traps)	for costs and labour.5 yearly pond maintenance for septage wastes instead of every 3 years.	
Condition 8, Table 4 Paper, cardboard and light plastics	<p>The Shire of Carnarvon believes it is exempt from recycling (i.e. no kerbside recycling undertaken) due to no recycling facilities being located at an economical distance. Therefore, the recycling through baling is not a guaranteed outcome and baled paper and cardboard are stored undercover. Also, plastics are disposed of at the landfill. Can the applicable conditions be deleted and replaced with:</p> <p>Paper and cardboard for potential recycling, and:</p> <ul style="list-style-type: none"> <li>(a) Stored within a designated storage area for shredding and/or baling for potential recycling offsite;</li> <li>(b) Stored for no longer than necessary prior to disposal, or potential recycling;</li> <li>(c) Baled cardboard and paper may be stored within an enclosed shed prior to discharge for potential reuse offsite, or disposal.</li> <li>(d) The above edit considers the formerly deleted "(c) Stored within a designated, enclosed waste receipt.</li> </ul>	<p>Reference to light plastic has been removed from condition 4, table 3 and from condition 8, table 4. "Reuse" has been corrected to "recycling". Column 3, row 7 has been further clarified "excluding cardboard and paper for offsite recycling".</p> <p>The storage time requirement for paper and cardboard, point b, has been removed.</p> <p>The delegated officer recognises that the regional location of the premises can create feasibility issues for recyclables transport. The delegated officer has determined that this condition is sufficiently worded to allow for the licence holder to landfill or stockpile paper and cardboard to be transported offsite where feasible.</p>
Condition 8, Table 4, E- waste Receipt, handling and storage prior to transfer for recycling	Disagreed. There is no economical and operational capacity to undertake this e-waste license condition. Carnarvon is considered isolated – remote due to the distance to any possible markets for the e-waste. Furthermore, this is a further cost onto the Shire of Carnarvon which due to excessive costs cannot be covered in the budget by any measure. The Shire of Carnarvon therefore will propose to not accept e-Waste thus this required infrastructure will not be required and should be removed from this draft Licence. The Shire of Carnarvon does not have the financial capacity to undertake this License requirement. Request moratorium of three years to implement. E Waste is not allowed to be disposed of at this staffed site so internal controls will manage this e-waste matter.	The Department has removed e-waste from the waste acceptance and processing tables. It is noted that the Shire is aware of the <a href="#">e-waste to landfill ban</a> implemented 01 July 2024.
Condition 23	Disagreed. Wholly impractical given the desert climate of Carnarvon, minimal rainfall, and scarce water supplies at the site. Dust in Carnarvon generally is a fact of life due to the dryness of the location and the regular strong winds. Dust at the site has not been reported as a nuisance or otherwise, and the location is isolated from sensitive premises. Wind direction mostly blowing away from town site: winds are predominantly south-westerly.	The delegated officer notes scarcity of water in the region, residential premises are 900 m west of the premises, and there have been no complaints of dust emissions and. This condition has been replaced with an outcome-based dust condition.
Condition 24	Disagreed. First, as per condition 23 in table 19 above. Secondly, this condition is ambiguous as it does not refer to the Table 4 Conditions thus is interpreted as all wastes and recycled materials.	Definitions for recycled material and reference to the recycled material specification have been included in table 10 of the licence. Schedule 3 requires high risk loads to be kept wet before being redirected to an appropriately authorised facility. Schedule 3 has been updated to note that high risk asbestos material can be landfilled at this premises as per condition 8. Condition 8 requires loads to be wetted down prior to crushing. Condition 11 wording has been updated to refer to "Inert

Licence: L7065/1997/11

Condition	Summary of licence holder's comment	Department's response
		<p>Waste Type 1 (C&amp;D waste) entering the premises in accordance with condition 8" rather than "waste".</p> <p>This condition has been removed as requested. The delegated officer deems that dust emissions are adequately covered by these changes and the updated condition 23.</p>
Condition 25	Disagreed. First, as per condition 23 in table 19 above. Secondly, this condition is ambiguous as it does not refer to the Table 4 Conditions thus is interpreted as all wastes and recycled materials.	<p>Definitions for recycled material and reference to the recycled material specification have been included in table 10 of the licence. Condition 8 requires loads to be wetted down prior to crushing. Condition 11 wording has been updated to refer to "Inert Waste Type 1 (C&amp;D waste) entering the premises in accordance with condition 8" rather than "waste". The delegated officer notes that this premises can accept and landfill asbestos waste and therefore Schedule 3 has been updated to note this.</p> <p>This condition has been removed as the delegated officer deems that dust emissions are adequately covered by these changes and the updated condition 23.</p>
Condition 30	Disagreed. The current once yearly groundwater monitoring requirement is sufficient. No adverse outcomes have been observed or reported to justify this reduced sampling period. The identified 'risk' related to the increase in sewage capacity cannot be used given the relatively low volumes of sewage compared to larger places in sensitive areas.	<p>The delegated officer accepts this request.</p> <p>Pond maintenance compliance reporting, to maintain the liner of the liquid waste ponds, has been conditioned (conditions 2 and 3). The delegated officer deems this sufficient to maintain permeability requirements of the ponds and reduce the risk of seepage to the claypan.</p>
Condition 32, Table 7 Monitoring of Ambient groundwater quality	<p>Request that the extra tests be caveated with a 2 year term so the Shire of Carnarvon can investigate sampling and transport limitations for the extra tests given Carnarvon is in a remote location and transport services are very constrained and on time delivery would be problematic.</p> <p>Increased frequency of monitoring from annually to six monthly.</p> <p>Disagreed. The current one yearly is sufficient. No adverse outcomes have been observed or reported to justify this reduced sampling period.</p>	<p>These additional tests are standard groundwater monitoring requirements as noted in the risk assessment. If the Shire of Carnarvon encounters difficulty in sampling and transport then it can apply to have the licence amended at a later date.</p> <p>Monitoring frequency has been adjusted to as per response above.</p>