Government of Western Australia
Department of Water and Environmental Regulation

Amendment Report

Application for Licence Amendment

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

Licence Number	L8871/2014/2
Licence Holder	Veolia Recycling and Recovery (Perth) Pty Ltd
ACN	118 828 872
File Number	DER2014/002858-1
Premises	North Bannister Resource Recovery Park 6264 Albany Highway NORTH BANNISTER WA 6390 Legal description - Lot 2 on Deposited Plan 2767
Date of Report	6 October 2025
Decision	Revised licence granted

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1. Decision summary

Licence L8871/2014/2 is held by Veolia Recycling and Recovery (Perth) Pty Ltd (Licence Holder) for the North Bannister Resource Recovery Park (the Premises), located at 6264 Albany Highway, North Bannister.

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 L8871/2014/2 has been granted.

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 2 December 2021 the Licence Holder had an amendment to Licence L8871/2014/2 granted to enable acceptance of Food Organics and Garden Organics (FOGO) wastes and the operation of an interim FOGO facility.

On 25 August 2022 the Licence Holder was granted Works Approval W6668/2022/1 to allow construction works relating to an expansion of the FOGO processing facility at the premises, to include a screening plant. This infrastructure supported the increased acceptance of FOGO from 10,000 tonnes per annum up to 40,000 tonnes per annum. These works and increased throughput were incorporated into the Licence amendment granted on 31 July 2024, allowing operation of the expanded FOGO processing facility.

On 17 February 2025 the Licence Holder submitted an application to the department to amend Licence L8871/2014/2 under section 59 and 59B of the *Environmental Protection Act 1986* (EP Act). The application included both administrative and risk-based amendments to the wording of licence conditions to accurately reflect current operations at the premises. Assessment of this application is the basis of this Amendment Report.

The below requested amendments have been deemed to be administrative in nature as they do not alter the risk profile of the Premises, providing that activities, emissions and receptors as stated in existing approvals remain unchanged:

1. Correct the premises street address;
2. Modify waste processing conditions referring to compost as a waste;
3. Modify phrases used within waste processing conditions to more accurately differentiate between feedstock, composting windrows, the two processing lines and finished compost product;
4. Delete the phrase ‘quarantine waste’ and replace it with ‘biosecurity waste’ to align with modified terminology in the *Biosecurity Act 2015*;
5. Modify the acronym DAWR for the Department of Agriculture and Water Resources and replace it with DAFF for the Department of Agriculture, Fisheries and Forestry to reflect the 2022 departmental name change;
6. Addition of the missing event description for any time the sump leachate head exceeds the operational level;
7. Update the reference name of the noted document for process monitoring of

compost windrows;
8. Update definitions for Department of Agriculture and Water Resources to Department of Agriculture, Fisheries and Forestry; and
9. Add definition for feedstock.

The below requested amendments are risk-based as they have the potential to alter the risk profile of the premises. The potential emissions and discharges resulting from the below requested amendments will be risk assessed in Table 4:

1. Modify waste processing conditions to alter the core temperature of the composting windrows from being between 60°C and 70°C, to being above 55°C.
2. Modify waste processing conditions to alter the moisture level in the composting windrows from being maintained between 50% to 60%, to being maintained between 40% and 65% to align with industry standards;
3. Modify waste processing conditions to alter the dimensions and volume of the composting windrows to facilitate two processing lines sized to the as-constructed processing area approved under works approval W6668/2002/1 (granted 25/08/2022);
4. Modify waste processing conditions to alter the specified location of the firebreak in order for it to surround the two compost processing lines, as approved under works approval W6668/2002/1 (granted 25/08/2022);
5. Delete the timeframe to remove stockpiles of shredded wood within 28 days of processing, to be replaced with removal when a stockpile reaches a size limit of 1,500 m^3;
6. Removal of the requirement for plant and machinery to be installed with exhaust silencers and regularly maintained to limit unnecessary noise;
7. Describe the tipping face as a 50 m x 50 m area and 6 m height basis, rather than a 50 m length and 6 m height; and
8. Addition of a management action for exceeding the sump leachate head and when the leachate pond freeboard exceeds the operational level for when a failure or blockage occurs. The leachate to be in the first instance diverted into one of the on-site leachate ponds, and subsequently as currently conditioned off-site by a licensed carrier for disposal;

The Licence Holder also requested that licence conditions regulating the storage of compost product be removed from the licence. This is based on previous DWER correspondence related to another of the Licence Holder's premises where compost was considered a product, not a waste.

DWER notes the *Guideline: Better practice organics recycling* considers solid organic material that has completed the composting process is considered compost and is a product. The guideline considers the storage of compost product can be a source of leachate generation, contamination of stormwater, odour, dust, unauthorised fires and the generation of vectors. In that regard, licence conditions referencing compost as a waste will be amended to refer to it as a product. The storage of compost product at the premises will be assessed under this amendment application.

In addition, on 2 May 2025 and 11 July 2025 the Licence Holder provided detailed construction specifications for a compost product storage area which aligns with the requirements of the *Guideline: Better practice organics recycling*. These construction aspects will be assessed under this amendment application.

This amendment does not seek to change the existing assessed production and/or design capacities of the prescribed activities occurring at the Premises, as specified in Table 1 below.

Table 1: Approved production and/or design capacity

Category	Approved production/design capacity
Category 57 used tyre storage	1000 tyres
Category 61 liquid waste facility	16,000 tonnes per annum
Category 61A solid waste facility	90,000 tonnes per annum
Category 62 solid waste depot	14,000 tonnes per annum
Category 64 Class II or III putrescible landfill	400,000 tonnes per annum
Category 67A compost manufacturing and soil blending	100,000 tonnes per annum Inclusive of 40,000 tonnes per annum FOGO

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

Sources	Emission	Potential pathways	Proposed controls
Storage of compost product	Leachate	Direct discharge to land, subsurface seepage.	• Limited to storage of mature, pasteurised compost product only. • Subgrade of engineered fill or ripped and compacted in-situ material. • Hardstand of 40 mm asphalt thickening to 100 mm adjacent to concrete kerbing, laid over a base course of 260mm thick gravel, compacted to 95% DDRI. • Grading of 3% across the hardstand area directing surface water runoff away from vehicle access points

Sources	Emission	Potential pathways	Proposed controls
			and towards a designated drainage point in the southeast corner of the storage pad. • Bunding to surround the hardstand pad.
	Contaminated stormwater	Direct discharge to land, subsurface seepage.	• Fit-for-purpose, industrial-grade, UV stabilised, waterproof rated, reinforced polyethylene tarps will be used as a standard installation atop a completed compost product stockpile. • Tarps will be secured using appropriate weights such as concrete blocks, tyres, sand bags or the like, placed at strategic points along tarp edges. • Additional securing measures will be implemented prior to rainfall events based on forecasted weather conditions.
	Odour	Air/windborne pathway.	• Compliance with existing licence conditions regulating the composting process.
	Dust	Air/windborne pathway.	• Product stockpiles maintained in a slightly moist state.
	Unauthorised product fires – smoke and fire spread	Air/windborne pathway.	• Product stockpiles maintained in a slightly moist state. • Storage area is located within a previously cleared area and adjacent to the composting processing area.
	Vectors	Air/windborne pathway.	• Storage of compost product will be limited to pasteurised compost that meets the quality requirements of AS 4454.
	Product quality	Discharge of contaminants to land through application of contaminated products.	• Storage of compost product will be limited to pasteurised compost that meets the quality requirements of AS 4454. • Tarpaulins will be used to cover the stockpiles of compost product to prevent deterioration of quality.

Sources	Emission	Potential pathways	Proposed controls
Processing of compost: • core temperature • moisture content • dimensions & volume of windrows • fire breaks	Unauthorised tyre fires – smoke and fire spread	Air/windborne pathway.	• Moisture content to be increased. • Fire breaks modified to surround the two compost processing lines and encapsulate the increased dimensions and volume of windrows.
	Product quality	Direct discharge of contaminants to land through application of contaminated products.	• Temperatures and moisture content comply with Australian Standard AS 4454 and industry standards to ensure improved product quality.
Stockpiles of shredded wood	Unauthorised tyre fires – smoke and fire spread	Air/windborne pathway.	• Removal when a stockpile reaches a size limit of 1,500 m^3.
Plant and machinery	Noise	Air / windborne pathway.	• The applicant considers the premises is sufficiently distanced from the closest sensitive residential receptors whereby noise emissions will not pose an adverse impact.
Leachate exceeding the sump head and freeboard within the leachate ponds	Leachate	Direct discharge to land, subsurface seepage.	• Implementation of a new management action where, in the first instance, leachate will be diverted into one of the on-site leachate ponds that has existing capacity, and secondarily as currently conditioned for a licensed carrier to transport it off-site for disposal.
Expansion of the landfill tipping face	Windblown wastes	Air / windborne pathway.	• Compliance with existing licence conditions regulating waste cover requirements.
	Odour	Air / windborne pathway.	
	Vectors	Air / windborne pathway.	

3.1.2 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 3 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 3: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	**Distance from prescribed activity**
Residential premises	3 km east of the premises boundary
Environmental receptors	**Distance from prescribed activity**
Serpentine Dam Catchment Area – Priority 2 Public Drinking Water Source Area	Within premises boundary. Note: Landfill footprint is situated outside the Serpentine Dam Catchment Area.
Serpentine Dam Catchment Area – Priority 1 Public Drinking Water Source Area	Directly adjacent to the northern premises boundary.
Bannister River	Within premises boundary. Non-perennial watercourse flowing south-east through the premises. Constructed dams have been established along its course to hold water onsite. Flows to the Murray River, which discharges to Peel-Harvey Estuary.
Serpentine River	Non-perennial tributary located adjacent to the northern premises boundary. A constructed dam has been built to retain surface water onsite. The premises is situated outside the catchment area. Main river channel is located 3.4km north-west of the premises boundary. Ultimately discharges to Peel-Harvey Estuary via the Serpentine River.
Dwellingup State Forrest	Directly adjacent to the northern and western premises boundaries.
Beelaring Class C Nature Reserve	Directly adjacent to the northern and western premises boundaries.
Threatened fauna	Scattered records as close as 700m east-northeast of premises boundary.
Gringer Creek	Minor river, tributary to Bannister River. Approximately 6km to the south-east of the premises boundary. Flows to the Bannister Rive, which ultimately discharges to the Peel-Harvey Estuary via the Murray River.
Groundwater	Premises is situated atop groundwater resource area – Karri, Karri, Combined – Fractured Rock West - Alluvium The depth to groundwater varies across the site ranging from 1.5 to 20.5 meters below ground level (mbgl) (319 to 345 mAHD). Well and borehole drilling indicates the presence of an unsaturated zone between the landfill liner and groundwater.

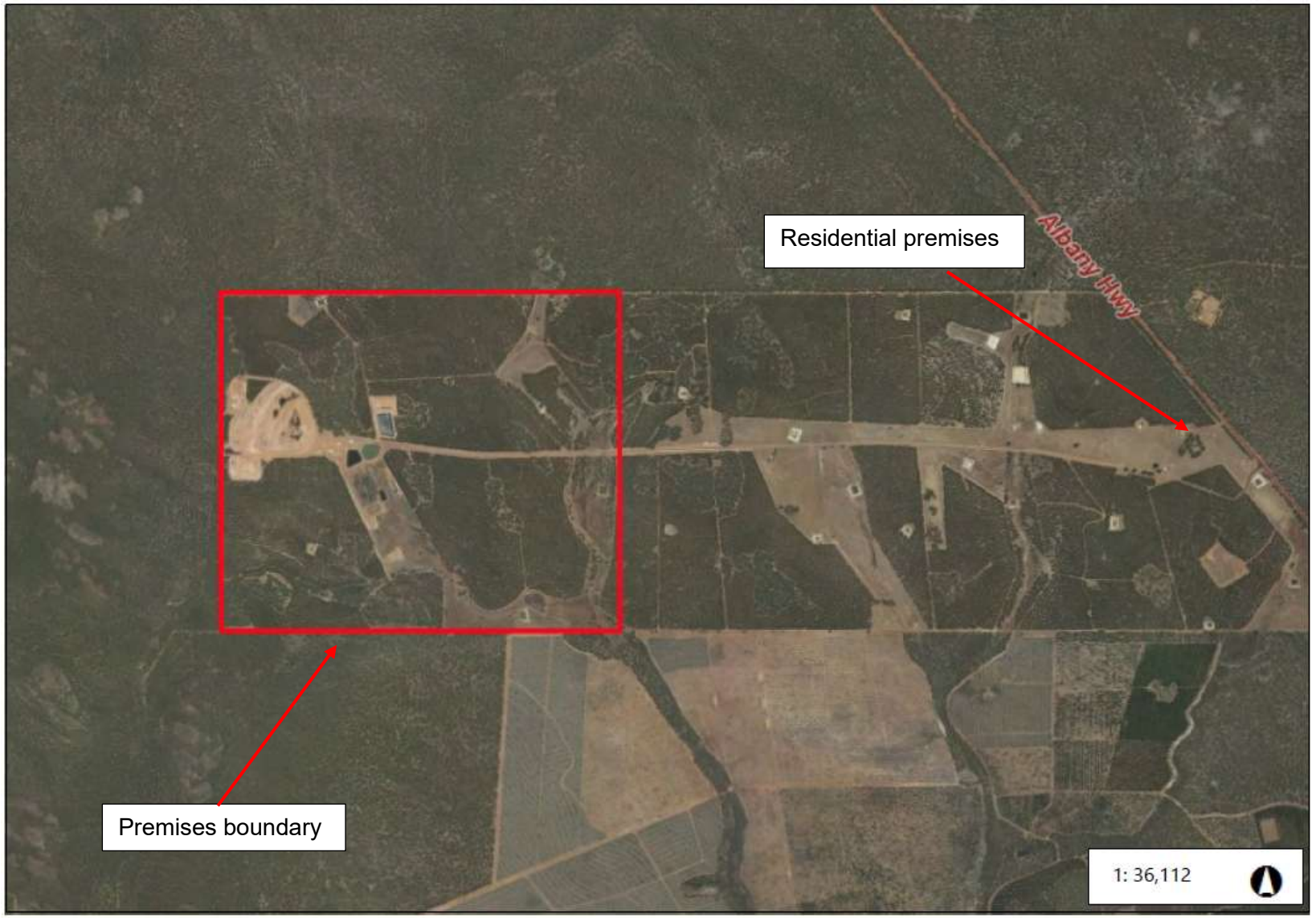

Figure 1: Distance to sensitive receptors

Licence: L8871/2014/2

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 in-complete 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 4.

The Revised Licence L8871/2014/2 that accompanies this Amendment Report authorises emissions associated with the operation of the Premises.

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

Table 4. Risk assessment of potential emissions and discharges from the Premises during operation

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions[2] of licence	Justification for additional regulatory controls
Source / Activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Licence Holder's controls**				
Operation								
Storage of compost product	Leachate	Direct discharge to land, subsurface seepage. Impacts to surface and groundwater sources.	P1 & P2 PDWSA Surrounding river systems	Refer to Section 3.1	C = Major L = Unlikely **Medium Risk**	Yes	Conditions 1, 2, 3, 10, 17, 18, 19, 26, 27, 28, 29, 34, 35, 36, 37 and 38.	The Delegated Officer considers the controls proposed by the applicant are sufficient to mitigate the risk of leachate under most circumstances. As this risk is mitigated by adequate implementation of these applicant controls, the Delegated Officer shall enforce these controls via construction, operational and maintenance conditions on the Licence.
	Contaminated stormwater	Direct discharge to land, subsurface seepage. Impacts to surface and groundwater sources.		Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	Yes	Conditions 1, 2, 3, 10, 27, 34, 37 and 38.	The Delegated Officer considers that the storage of finished compost product upon a hardstand pad and covered by weighted tarpaulins will mitigate contamination of stormwater under most circumstances. The Delegated Officer notes that Stormwater Dams 2 and 3 are located downgradient of the compost product storage area and are subject to two sampling events per year.
	Odour	Air / windborne pathway. Impacts to health and amenity	None	Refer to Section 3.1	No receptors present	Yes	N/A	The Delegated Officer considers there is no foreseeable risk from odour emissions given the distance to sensitive receptors. Emission to be regulated under the general provisions of the EP Act
	Dust	Air / windborne pathway. Impacts to health and amenity	None	Refer to Section 3.1	No receptors present	Yes	N/A	The Delegated Officer considers there is no foreseeable risk from dust emissions given the distance to sensitive receptors. Emission to be regulated under the general provisions of the EP Act
	Compost product fires – smoke and fire spread	Air/windborne pathway. Impacts to health and amenity and protected vegetation areas.	Residential premises State forest and nature reserve	Refer to Section 3.1	C = Severe L = Unlikely **High Risk**	Yes	Conditions 6 and 7. **Condition 10**	The Delegated Officer considers that mitigation measures to prevent fires occurring in stockpiles of compost product is required. Additional regulatory controls have been applied to the licence including stockpile size limits, separation distances, monitoring requirements, and maintenance of a fire break surrounding the storage area.
	Vectors	Air / windborne pathway. Impacts to health and amenity	Public health and amenity	Refer to Section 3.1	C = Minor L = Rare **Low Risk**	Yes	Conditions 4, 5 and 8.	The Delegated Officer considers the pasteurisation process facilitated during composting meets the quality requirements of AS 4454, which is sufficient to mitigate vectors within compost product. Existing regulatory controls are sufficient to manage the composting process and mitigate vectors.
Composting of green waste, food processing waste and FOGO: • core temperature	Compost processing fires – smoke and fire spread	Air/windborne pathway. Impacts to health and amenity and protected	Residential premises State forest and nature reserve	Refer to Section 3.1	C = Severe L = Unlikely **High Risk**	Yes	Conditions 6, 7 and 8. **Condition 8**	The Delegated Officer considers the requested modifications to increase compost core temperature and moisture content, the dimensions and volume of the composting windrows and expand the fire breaks to surround the two compost processing lines do not modify the risk profile for incidence of fire.

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions[2] of licence	Justification for additional regulatory controls
Source / Activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Licence Holder's controls**				
• moisture content • dimensions & volume of windrows • fire breaks		vegetation areas.						The Delegated Officer considers the core temperature of the composting windrows requires an upper limit to prevent self-combustion during composting. Monitoring requirements have been added to the licence, consistent with the requirements of the DWER Guideline: Better practice organics recycling.
	Product quality	Direct discharge of contaminants to land through application of contaminated products. Impacts to public health and amenity.	Any receiving environment of the composted product	Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	Yes	Conditions 4, 5, 8, 22, 23, 24 and 34. **Condition 8**	The Delegated Officer considers the requested modifications to increase compost core temperature and moisture content do not modify the risk profile for product quality. Existing regulatory controls will be modified to facilitate this change. Compost core temperature will be modified to align with the requirements of AS 4454 whereby the core temperature of the composting windrows shall be maintained at 55ºC or higher for 15 days or longer for the initial aerobic composting process.
Stockpiles of shredded wood	Wood stockpile fires – smoke and fire spread	Air/windborne pathway. Impacts to health and amenity and protected vegetation areas.	Residential premises State forest and nature reserve	Refer to Section 3.1	C = Severe L = Unlikely **High Risk**	Yes	Conditions 6, 7 and 8.	The Delegated Officer requires additional mitigation measures to prevent fires occurring in stockpiles of shredded wood during storage. An additional regulatory control has been applied to the licence requiring an upper stockpile temperature limit of 75ºC during storage. The modification of stockpile management from a day limit to a size limit will provide further mitigation of fire size. Existing regulatory controls will be modified to facilitate this change.
Plant and machinery	Noise	Air / windborne pathway. Impacts to health and amenity.	None	Refer to Section 3.1	No receptors present	Yes	N/A	The Delegated Officer considers there is no foreseeable risk from noise emissions given the distance to sensitive receptors. Existing regulatory controls will be removed from licence conditions with emissions to be regulated under the *Environmental Protection (Noise) Regulations 1997*.
Leachate exceeding the sump head and freeboard within the leachate ponds	Leachate	Direct discharge to land, subsurface seepage. Impacts to surface and groundwater sources.	P1 & P2 PDWSA Surrounding river systems	Refer to Section 3.1	C = Major L = Unlikely **Medium Risk**	Yes	Conditions 10, 12, 17, 18, 19, 26, 34, 35 and 36	The Delegated Officer considers the requested modifications for leachate to be in the first instance diverted into one of the on-site leachate ponds, and subsequently as currently conditioned off-site by a licensed carrier for disposal, does not modify the risk profile for leachate emissions. Existing regulatory controls will be modified to facilitate this change.
Expansion of the landfill tipping face	Windblown wastes	Air / windborne pathway. Impacts to protected vegetation areas	State forest and nature reserve	Refer to Section 3.1	C = Moderate L = Unlikely **Medium Risk**	Yes	Condition 16	The Delegated Officer considers existing waste cover practices sufficient to mitigate impacts from windblown wastes with the modification to the landfill tipping face size. Existing regulatory controls will be modified to facilitate this change.

Risk Event					Risk rating[1] C = consequence L = likelihood	Licence Holder's controls sufficient?	Conditions[2] of licence	Justification for additional regulatory controls
Source / Activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Licence Holder's controls**				
	Odour	Air / windborne pathway. Impacts to health and amenity	None	Refer to Section 3.1	No receptors present	Yes	N/A	The Delegated Officer considers there is no foreseeable risk from odour emissions given the distance to sensitive receptors. required. Emission to be regulated under the general provisions of the EP Act.
	Vectors	Air / windborne pathway. Impacts to health and amenity	Residential premises	Refer to Section 3.1	C = Major L = Unlikely **Medium Risk**	Yes	Conditions 13 and 14.	The Delegated Officer considers existing waste cover practices are sufficient to mitigate impacts from vectors with the modification to the landfill tipping face size. Existing regulatory controls will be modified to facilitate this change.

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.

4. Consultation

Table 5 provides a summary of the consultation undertaken by the department.

Table 5: Consultation

Consultation method	Comments received	Department response
Licence Holder was provided with draft amendment (22/08/2025)	See Appendix 1	See Appendix 1

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 6 provides a summary of the proposed amendments and will act as a record of implemented changes. All proposed changes have been incorporated into the Revised Licence as part of the amendment process.

Table 6: Summary of licence amendments

Revised licence condition	Conversion notes
Cover page	Typographical error in premises street address corrected.
Condition 1 Table 1	Addition of construction requirements for the compost product storage area.
Condition 2	Addition of construction audit requirements.
Condition 3	Addition of Environmental Compliance Report requirements.
Condition 4 Table 2	Addition of Garden Organics (GO) for clarity as the premises accepts this as a specified waste type sourced from municipal collections of designated GO bins that falls under the Category 67A composting activities, however with no volumetric change to the quantity of waste received. Typographical error in the acceptance specification for untreated wood waste, where ‘c pesticides’ was corrected to ‘pesticides’ in Row (viii).
Condition 8 Table 4	Row 9 waste type modified to remove ‘solid’ from green waste and add FOGO for clarity and consistency with on-site activities. Row 10 ‘storage of compost prior to removal offsite’ removed from specified processes, as compost product is retained on-site for storage. Modifications to the process limits or specifications to remove reference to storage for compost product, modify compost reference to read feedstock, modify temperature requirements, moisture levels, stockpile dimensions, fire breaks, use of leachate and use of firefighting water for composting windrows. Row 11 waste type modified to alter quarantine to biosecurity waste. Modification to the process limits or specifications to amend the title of the document specifying disposal requirements.

Revised licence condition	Conversion notes
	Row 12 modification to the process limits or specifications to enable storage of 1500 m^3 of stockpiled shredded wood. To complement this change and for clarity, reference to shredded wood stockpiles has been removed from the dimensions dot point, so this requirement is limited to unshredded wood waste only. Addition of temperature limit for stockpiles of shredded wood.
Condition 10 Table 6	Table column headings: Waste Materials modified to read Materials, to accurately reflect all materials stored on the premises which includes compost product. Row 2 materials modified to include final, untested compost material. The phrases 'storage, composting and maturation' deleted for clarity as these are processes not descriptions of material. Row 3 added to include the compost product storage infrastructure, with the specified material being compost product post-testing. Requirements include stockpile dimensions and separation distances, weighted tarpaulin use, temperature limit for stockpiles, fire breaks and maintenance of the area to be free of leaks and defects. Row 4 material types modified to state food and beverage processing wastes are incorporated into the composting process.
Condition 12 Table 7	Row 1 deleted to remove the requirement for plant and machinery infrastructure requirements relating to noise mitigation.
Condition 13	Condition 13(a) amended to reflect the requested description of the landfill tipping face dimensions.
Condition 19 Table 11	Row 1 event updated to insert missing text. Management action updated to enable leachate in a failed or blocked leachate collection system to in the first instance be removed to one of the on-site leachate ponds with sufficient capacity and secondarily transported off-site. Row 2 management action updated to enable leachate in a failed or blocked leachate collection system to in the first instance be removed to one of the on-site leachate ponds with sufficient capacity and secondarily transported off-site.
Condition 22 Table 13	Row 3 input/output modified to read compost product. Parameter modified to read final compost product.
Condition 27 Table 16	Updated list of groundwater monitoring bores in Table 15 as requested by the Licence Holder to delete bores MW02 and MW04A and replace them with MW02A and MW04B.
Definitions Table 19	Deletion of definitions: AACR and DAWR. Addition of definitions: DAFF, DAWE, dunnage, feedstock, GO and suitably qualified structural engineer.
Schedule 1: Maps Premises infrastructure and monitoring map	Premises infrastructure and monitoring map updated to include the compost product storage area and remove Cell 7. Figures 3, 4 and 5 added depicting the construction specifications for the compost product storage area.

References

1. Department of Environment Regulation (DER) 2015, *Guidance Statement: Setting Conditions*, Perth, Western Australia.
2. Department of Water and Environmental Regulation (DWER) 2020, *Guideline: Environmental Siting*, Perth, Western Australia.
3. 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 8 Table 4	Our operations team has concerns with the newly introduced minimum 2 m windrow separation requirement in Table 4. We note this condition is not included in the current version of our licence and request that this be removed or reduced to 1 m, which would be operationally achievable while maintaining sufficient width for bobcat access to windrows if needed. Current operational separation widths range between 1.1 m to 1.5 m, which accommodates their 44" (~1.1m) bobcat bucket and ensures adequate equipment access without requiring operational changes to achieve compliance.	The Delegated Officer considers a separation distance to allow sufficient access for firefighting equipment to pass between windrows, in conjunction with the fire mitigation measures in practice at the premises are sufficient to prevent fires within the compost in most circumstances. The separation distance specified in condition 8 Table 4 has been modified to reflect this requirement.
Condition 10 Tale 6	It is also requested that the new requirement for compost product separation distance of 2 m be removed or reduced to 1 m for operational consistency and to ensure sufficient access width for equipment while maintaining appropriate separation.	The Delegated Officer considers a separation distance of 1 m between stockpiles of compost product in conjunction with the fire mitigation measures in practice at the premises are sufficient to prevent fires within the compost in most circumstances. The separation distance specified in condition 10 Table 6 has been modified to 1 m.
Condition 26 Table 14	Following advice received from our Organics Technical Manager, removal of the compost product temperature monitoring requirement is requested. While maintaining temperatures of composted product stockpiles below 75°C as specified in Table 6 is accepted, the North Bannister Facility has a very stable and mature product after 16+ weeks of composting. While there would still be some retention of heat in the mass for several months, it will generally sit in the mesophilic temperature range (<45°C), making frequent temperature monitoring redundant. Furthermore, when compost is screened to such a fine particle size of 8mm, there is significantly restricted airflow in the compost heap, which greatly reduces the risk of fire in the product.	The Delegated Officer concurs that screening will restrict airflow within the compost product. The Delegated Officer considers that the screening process and the physical movement of the compost product from the composting area to the compost product storage area will contribute to reducing internal temperatures of the compost product. These two factors in conjunction with the infrastructure requirements in condition 10 Table 6 will reduce the risk of fire within the compost product. As such, further temperature monitoring is not considered necessary as a preventative action. The requirement for monitoring of temperature within the compost product has been removed from condition 26 Table 14.

Condition	Summary of Licence Holder's comment	Department's response
Condition 27 Table 15	Monitoring bores MW02 and MW04A have been decommissioned and replaced with MW02A and MW04B. Can the table please be updated to reflect this change. The original premises map already included the new bores.	Condition 27 Table 15 updated as requested.
Schedule 1 Maps	Provision of an updated premises map showing current infrastructure, storage areas, monitoring points and future landfill cells.	Inserted as Figure 2.