



Application for Licence

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

Licence Number	L9442/2024/1
Applicant	Community Resources Limited
ACN	622 913 384
File number	DER2024/000211
Premises	Soft Landing Limited 26 Achievement Way Wangara WA 6065 Legal description - Lot 6 on Plan 17244 Certificate of Title Volume 1860 Folio 464
Date of report	13 August 2024
Decision	Licence granted

Abbie Crawford
MANAGER, WASTE INDUSTRIES
an officer delegated under section 20 of the *Environmental Protection Act 1986* (WA)

Table of Contents

1. Decision summary	1
2. Scope of assessment	1
2.1 Regulatory framework	1
2.2 Application summary and overview of premises	1
3. Risk assessment.....	2
3.1 Source-pathways and receptors	2
3.1.1 Emissions and controls	2
3.1.2 Receptors.....	4
3.2 Risk ratings.....	6
4. Consultation	9
5. Conclusion	9
References.....	9
Appendix 1: Application validation summary.....	10

Table 1: Proposed applicant controls	2
Table 2: Sensitive human and environmental receptors and distance from prescribed activity.	4
Table 3: Risk assessment of potential emissions and discharges from the premises during operation.....	7
Table 4: Consultation	9
Figure 1: Distance to sensitive receptors.....	5

1. Decision summary

This decision report documents the assessment of potential risks to the environment and public health from emissions and discharges during the operation of the premises. As a result of this assessment, licence L9442/2024/1 has been granted.

2. Scope of assessment

2.1 Regulatory framework

In completing the assessment documented in this decision report, the Department of Water and Environmental Regulation (the department; DWER) 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 Application summary and overview of premises

On 9 May 2024, the applicant submitted an application for a licence to the department under section 57 of the *Environmental Protection Act 1986* (EP Act).

The application seeks a licence for the operation of a mattress, ensemble bed base and E-waste (including white goods) recycling facility. The applicant has not proposed any construction activities. The premises is located within Wanneroo general industrial area.

Community Resources Limited (the applicant) has operated a mattress, ensemble bed base, and white goods recycling facility at 9 Opportunity Street, Wangara, since 2019 under Licence L9220/2019/1. They held a five-year lease agreement that was valid until 1 April 2024. On 9 May 2024, the licence holder informed the department that they are no longer leasing at this premises and that the infrastructure has been relocated to the proposed location at 26 Achievement Way, Wangara. Accordingly, the licence holder applied to the department simultaneously for a new licence for the recycling plant located at 26 Achievement Way Wangara and for the surrender of Licence L9220/2019/1.

The premises is surrounded by other commercial and industrial businesses and is zoned "General Industry" under the City of Wanneroo District Planning Scheme No. 2. Two pre-existing enclosed buildings with a total floor area of approximately 2400 m² are situated in the centre of the site. These buildings are used for the manual processing, recycling, and storage of mattresses, bed bases, white goods, and e-waste. Additionally, there is a 400 m² covered space that connects the two main buildings that will be used for loading or unloading.

The premises currently accepts mattresses, ensemble bed bases and white goods, which are deconstructed, consolidated, and sorted for dispatch to processors for manufacture into new products. Approximately 75% of the total materials utilised in mattress and bed ensembles are recycled and diverted from landfills.

The premises relates to the category and assessed production capacity under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) which are defined in licence L9442/2024/1. The infrastructure and equipment relating to the premises category and any associated activities which the department has considered in line with *Guideline: Risk Assessments* (DWER 2020) are outlined in licence L9442/2024/1.

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 decision report are detailed in Table 1 below. Table 1 also details the control measures the applicant has proposed to assist in controlling these emissions, where necessary.

Table 1: Proposed applicant controls

Emission	Sources	Potential pathways	Proposed controls
Operation			
Dust	Vehicle movements Unloading, handling and storage of mattresses, ensemble bed bases, white goods and e-waste Mattress and ensemble bed base processing and mechanical breakdown of materials.	Air / windborne pathway	The processing activities and all machinery will occur in fully enclosed buildings. Mattress and ensemble bed base units are unloaded onto pallets within an enclosed building. Regular housekeeping and cleaning duties twice per day together with targeted daily turnover of inputs and outputs. All vehicle movements occur on a concrete hardstand.
Noise		Air / windborne pathway	The processing activities and all machinery will occur in fully enclosed buildings. Mattress and ensemble bed base units are unloaded onto pallets within an enclosed building. Truck and traffic movements are generally limited and occur at a frequency of 2–3 vehicles per hour during normal operating hours. The premises only operates 6 am - 6 pm to Monday to Friday.
Spill hydrocarbon/chemicals	Vehicle movements Storage and use of chemicals and hydrocarbons	Overland runoff / migration into surface water ways Seepage through soil	The processing activities and all machinery will occur in entirely enclosed buildings with a concrete hardstand. Spills will be cleaned up using dedicated spill kits. Any hazardous substances used on site (oils,

Emission	Sources	Potential pathways	Proposed controls
		and to groundwater	grease, gas for Forklift trucks) are stored in designated containment areas. E-Waste is stored in 1 m ³ bins and up to 10 of these bins will be on site at any one-time.
Fire/smoke	Large stockpiles of combustible waste. Leakage of refrigerant gases due to inappropriate storage.	Air / windborne pathway	The site has firefighting equipment as per building regulations, such as fire hose, fire extinguishers and air ducks. The firefighting equipment will be maintained at the appropriate time intervals. Stockpile sizes of mattresses and white goods stored at the facility at any one time are estimated to be 750 units and 90 units maximum respectively. Only 60 m ³ of form bales from mattress dismantling are stored in shipping container on the hardstand weekly. Only 50 m ³ of textiles from mattress dismantling are stored in piles on the hardstand for disposal daily. Only 100 m ³ of wood waste from bed base dismantling is stored in stacks on the hardstand for disposal weekly. Only 1 m ³ of plastic waste from packaging is stored in bins prior to disposal daily. All waste streams are stored separately from each other and have the minimum distance of 1 meter from other streams and any infrastructure. E-Waste is stored in 1 m ³ bins and up to 10 of these bins will be on site at any one-time. Maximum of 100 kilograms of refrigerant gases will be stored at the site at any one time.
Fire wash water		Overland runoff / migration into surface water ways Seepage through soil and to groundwater	Fully enclosed buildings with concrete hardstand. Internal drains will be closed off to retain fire water within the building. Sandbags on external drains will be available to use during an emergency situation.

3.1.2 Receptors

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

Table 2 and Figure 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 2: Sensitive human and environmental receptors and distance from prescribed activity

Human receptors	Distance from prescribed activity
Residential area	350 m north of the Premises boundary
Industrial area	Directly adjacent to Premises
Christian impact centre	120 m north of the premises boundary
Environmental receptors	Distance from prescribed activity
Priority ecological communities	Priority 3 - Banksia Woodlands of the Swan Coastal Plain ecological community –mapped within close proximity to the premises
Threatened ecological communities	Critically Endangered - Banksia attenuata woodlands over species rich dense shrublands – approximately 230 m north of the premises boundary
Geomorphic wetland – little Badgerup lake (sumpland)	Approximately 1.2 km north-east of the premises boundary
DBCA legislated lands	Yellagonga regional park – approximately 1.6 km south-west of the premises boundary
Drinking water source area	Priority 3 - Perth coastal and Gwelup underground water pollution control area – approximately 1.6 km south-west of the premises boundary
RIWI Act – groundwater area	The Premises located within the proclaimed Wanneroo groundwater area
Badgerup Lake	Approximately 1.4 km north of the premises boundary

3.2 Risk ratings

Risk ratings have been assessed in accordance with the *Guideline: Risk Assessments* (DWER 2020) for each identified emission source 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 applicant 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 applicant'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 applicant's controls are not deemed sufficient. Where this is the case the need for additional controls will be documented and justified in Table 3.

Licence L9442/2024/1 that accompanies this decision report authorises emissions associated with the operation of the premises.

The conditions in the issued licence, as outlined in Table 3 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 operation

Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
Operation								
Vehicle movements Unloading, handling and storage of mattresses, ensemble bed bases, white goods and e-waste	Dust	Air / windborne pathway causing impacts to health and amenity	Directly adjacent industrial Premises	Refer to Section 3.1	C = Minor L = Rare Low Risk	Y	Condition 1, 2, 4, 12, 13 and 14	The Delegated Officer considers that the Applicant's proposed infrastructure and management controls are likely to be sufficient at mitigating dust emissions
Mattress and ensemble bed base processing and mechanical breakdown of materials.	Noise		Residential area ~350 m north of the Premises boundary	Refer to Section 3.1	C = Minor L = Rare Low Risk	Y	Condition 1, 2, 4, 12, 13 and 14	The Delegated Officer considers noise emissions associated with the operation can be sufficiently managed through the <i>Environmental Protection (Noise) Regulations 1997</i> .
Large stockpiles of combustible waste Leakage of refrigerant gases due to inappropriate storage.	Fire/smoke	Air/windborne pathway causing impacts to health and amenity	Directly adjacent industrial Premises Residential area ~350 m north of the Premises boundary Yellagonga regional park ~1.6 km south-west of the premises boundary	Refer to Section 3.1	C = Severe L = Unlikely High Risk	Y	Condition 1,2, 3, 4, 5, 12, 13 and 14 <u>Condition 9, 10 and 11</u>	The Delegated Officer has reviewed the information regarding the impact of air emissions generated during a fire and has noted that; a fire prevention and management plan can help reduce the risks of impacts to fire and can be regulated through conditions in the license. The licence holder will be required to implement a Fire and Emergency Management plan that is consistent with AS3745

Risk events					Risk rating ¹ C = consequence L = likelihood	Applicant controls sufficient?	Conditions ² of licence	Justification for additional regulatory controls
Sources / activities	Potential emission	Potential pathways and impact	Receptors	Applicant controls				
Large stockpiles of combustible waste. Leakage of refrigerant gases due to inappropriate storage	Fire wash water	Overland runoff / migration into surface water ways potentially causing ecosystem disturbance or impacting surface water quality	Directly adjacent industrial Premises Residential area ~350 m north of the Premises boundary Premises located within the proclaimed Wanneroo groundwater area Badgerup Lake ~1.4 km north of the premises boundary	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	N	Condition 1, 8, and 14 <u>Condition 9, 10 and 11</u>	Conditions have been added to the licence to require the implementation of a Fire and Emergency Management Plan to prevent discharges of contaminated firewater into stormwater systems. A condition has also been added requiring internal drains to be closed off to prevent fire wash water from entering the stormwater system. .
Acceptance, storage and processing e-waste. Vehicle movements Storage and use of chemicals and hydrocarbons	Spills or leaks of environmentally hazardous wastes	Seepage through soil and to groundwater causing contamination and impacting groundwater quality	Geomorphic wetland ~1.2 km north-east of the premises boundary Yellagonga regional park ~1.6 km south-west of the premises boundary	Refer to Section 3.1	C = Moderate L = Unlikely Medium Risk	N	Condition 1,3,4, 5, 6, 7 and 14	The Delegated Officer considers that the Applicant's proposed infrastructure and management controls are likely to be sufficient at mitigating emissions from spills or leaks of leachate, hydrocarbon and chemicals

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

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

4. Consultation

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

Table 4: Consultation

Consultation method	Comments received	Department response
Application advertised on the department's website on 22/07/24	None received	N/A
Local Government Authority advised of proposal on 17 July 2024	<p>The City of Wangara provided advice regarding the licence application on 2 August 2024.</p> <p>The City advised that development approval granted on 8 January 2024 was given with the intention of using the area as a resource recovery centre, and the proposed activities under category 61A are consistent with the conditions of the approval.</p> <p>As a result, the City declared that they have no objection to the issuing of the license.</p>	Noted
Applicant was provided with draft documents on 08/08/2024	No comments received and request to waiver the comments period	N/A

5. Conclusion

Based on the assessment in this decision report, the delegated officer has determined that a licence will be granted, subject to conditions commensurate with the determined controls and necessary for administration and reporting requirements.

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: Application validation summary

SECTION 1: APPLICATION SUMMARY					
Application type					
Works approval	<input type="checkbox"/>				
Licence	<input checked="" type="checkbox"/>	Relevant works approval number:		None	<input checked="" type="checkbox"/>
		Has the works approval been complied with?			Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
		Has time limited operations under the works approval demonstrated acceptable operations?			Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
		Environmental Compliance Report / Critical Containment Infrastructure Report submitted?			Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
		Date Report received: N/A			
Renewal	<input type="checkbox"/>	Current licence number:			
Amendment to works approval	<input type="checkbox"/>	Current works approval number:			
Amendment to licence	<input type="checkbox"/>	Current licence number:			
		Relevant works approval number:		N/A	<input type="checkbox"/>
Registration	<input type="checkbox"/>	Current works approval number:		None	<input type="checkbox"/>
Date application received		09 May 2024			
Applicant and Premises details					
Applicant name/s (full legal name/s)		Community Resources Limited			
Premises name		Trading as Soft landing Ltd			
Premises location		26 Achievement Way Wangara Perth WA 6050 LOT #6 Diagram/plan No: 17244, Certificate of title Vol Number: 1860			
Local Government Authority		City of Wanneroo			
Application documents					
HPCM file reference number:		DER2024/000211			
Key application documents (additional to application form):		Attachment 1 A- Lease Attachment 1 B – ASIC Company extract Attachment 2 A and B - premises map Attachment 2 C – Site plan Attachment 2 D – Floor plan Attachment 3 B - proposed activities			
Scope of application/assessment					

Summary of proposed activities or changes to existing operations.	<p>A new licence application under category 61A to replace L9220/2019/1 premises at a new location.</p> <p>There are no construction activities required at the site.</p> <p>The premises currently accept mattresses, ensemble bed bases, and white goods products that are deconstructed, consolidated, and sorted for dispatch to processors for manufacture into new products.</p>	
Category number/s (activities that cause the premises to become prescribed premises)		
Table 1: Prescribed premises categories		
Prescribed premises category and description	Proposed production or design capacity	
Category 61A: Solid waste facility: premises (other than premises within category 67A) on which solid waste produced on other premises is stored, reprocessed, treated, or discharged onto land.	5,000 tonnes per annum	
Legislative context and other approvals		
Has the applicant referred, or do they intend to refer, their proposal to the EPA under Part IV of the EP Act as a significant proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Referral decision No: N/A
Does the applicant hold any existing Part IV Ministerial Statements relevant to the application?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Ministerial statement No: N/A EPA Report No: N/A
Has the proposal been referred and/or assessed under the EPBC Act?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Reference No: N/A
Has the applicant demonstrated occupancy (proof of occupier status)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Certificate of title <input type="checkbox"/> General lease <input checked="" type="checkbox"/> Expiry: 1 Jan 2029 Mining lease / tenement <input type="checkbox"/> Expiry: Other evidence <input type="checkbox"/> Expiry:
Has the applicant obtained all relevant planning approvals?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	Approval: Expiry date: The applicant stated that they obtained all relevant approvals. However, they did not provide planning approval with the application. Send direct interest letter to the City of Wanneroo, seeking confirmation of this.
Has the applicant applied for, or have an existing EP Act clearing permit in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	CPS No: N/A No clearing is proposed.

Has the applicant applied for, or have an existing CAWS Act clearing licence in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Application reference No: N/A Licence/permit No: N/A No clearing is proposed.
Has the applicant applied for, or have an existing RIWI Act licence or permit in relation to this proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Application reference No: Licence/permit No: Licence / permit not required.
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the EP Act)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Name: Wanneroo Groundwater Area Type: RIWI Proclaimed Groundwater area Has Regulatory Services (Water) been consulted? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Regional office: Swan Avon
Is the Premises situated in a Public Drinking Water Source Area (PDWSA)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Name: N/A Priority: N/A Are the proposed activities/ landuse compatible with the PDWSA (refer to WQPN 25)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
Is the Premises subject to any other Acts or subsidiary regulations (e.g. <i>Dangerous Goods Safety Act 2004, Environmental Protection (Controlled Waste) Regulations 2004, State Agreement Act xxxx</i>)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Is the Premises within an Environmental Protection Policy (EPP) Area?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Is the Premises subject to any EPP requirements?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Is the Premises a known or suspected contaminated site under the <i>Contaminated Sites Act 2003</i> ?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Classification: N/A Date of classification: N/A