Government of Western Australia
Department of Water and Environmental Regulation

Decision Report

Application for Works Approval

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

Works Approval Number	W2908/2025/1
Applicant	Veolia Recycling & Recovery (Perth) Pty Ltd
ACN	118 828 872
File number	APP-0027103
Premises	North Bannister Resource Recovery Park 6264 Albany Highway, North Bannister WA 6390 Legal description - Lot 2 on Deposited Plan 2767
Date of report	16 July 2025
Decision	Works approval granted

Abbie Crawford

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Date: 2025.07.16 10:43:17 +08'00'

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

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1. Decision summary

This decision report documents the assessment of potential risks to the environment and public health from emissions and discharges during the construction and operation of the premises. As a result of this assessment, works approval W2908/2025/1 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 15 January 2025, the applicant submitted an application for a works approval to the department under section 54 of the *Environmental Protection Act 1986* (EP Act).

The application is to undertake construction works relating to the development of an additional landfill cell (Cell 7) at the premises.

The premises is located approximately 94km south south-east of Perth at 6364 Albany Highway, North Bannister, WAas depicted in Figure 1. The premises currently operates under Licence L8871/2014/2. The premises boundary, as shown in Licence L8871/2014/2 (Licence), covers an approximately 390 hectare (ha) area within Lot 2. Cell 7 is located on the western end of Lot 2. Table 1 lists the prescribed premises categories that are authorised on the Licence.

The premises is bounded by bush to the north, south and west and by a Blue Gum plantation to the southeast and east. The premises is located in the Shire of Boddington (the Shire) and under the Shire's Local Planning Scheme No. 3 (LPS No. 3), the premises is classed as a special use zone within a rural area.

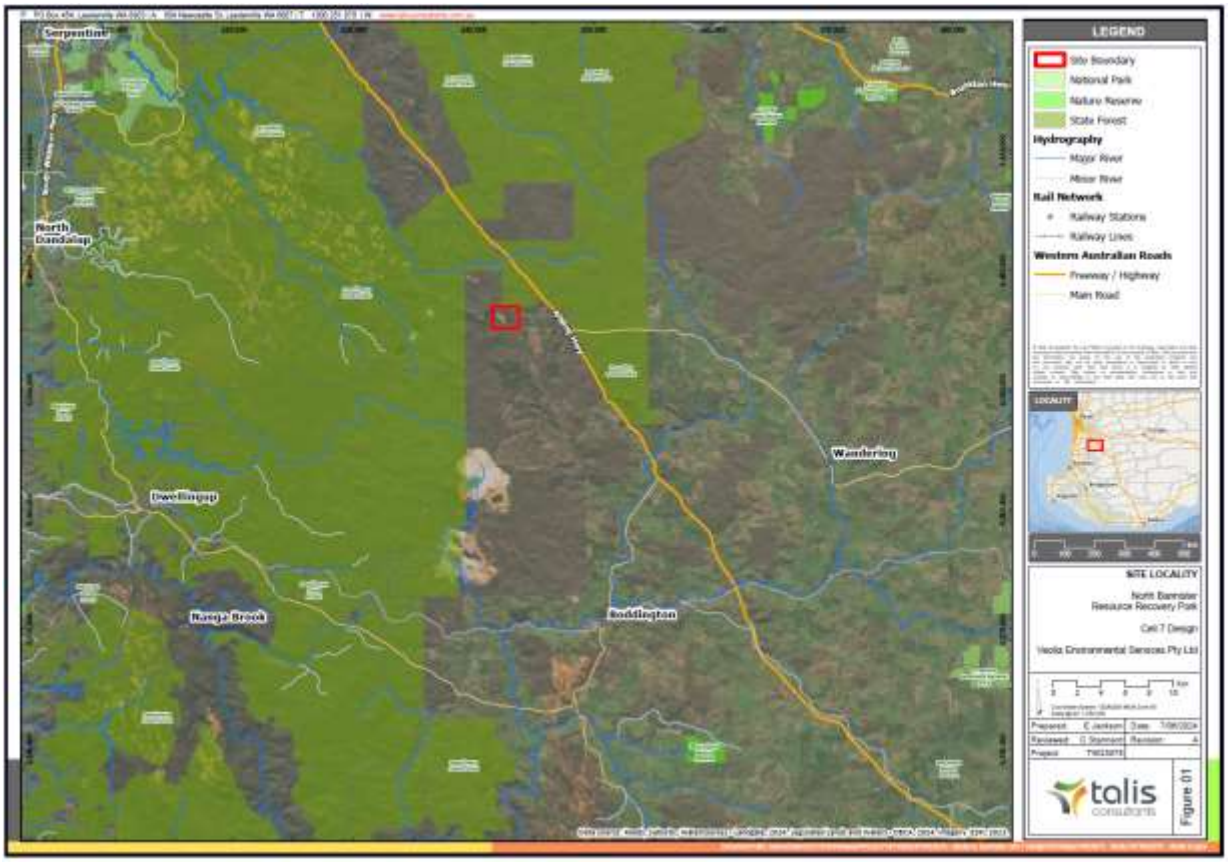

Figure 1: Premises location

The premises receives municipal, commercial, and industrial waste for disposal by landfilling under Category 64. The landfill operations encompass six existing landfill cells, drainage infrastructure, stormwater collection dam and leachate collection ponds. Accepted wastes are weighed on arrival using the weighbridge then are delivered directly to the tipping face, where they are deposited and incorporated directly into the waste mass.

The premises relates to the category and assessed design capacity under Schedule 1 of the *Environmental Protection Regulations 1987* (EP Regulations) which are defined in works approval W2908/2025/1. 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 works approval W2908/2025/1.

2.3 Legislative context

2.3.1 Part V of the EP Act

The premises is currently licenced as a prescribed premises under the *Environmental Protection Act 1986* (EP Act). The licence (L8871/2014/2) relates to the prescribed premises categories as described in Table 1 below:

Table 1: Prescribed premises categories

Prescribed premises category description (Schedule 1, Environmental Protection Regulations 1987)	Production / design capacity
Category 57: Used tyre storage premises (other than premises within category 56) on which used tyres are stored.	1,000 tyres
Category 61: Liquid waste facility: premises on which liquid waste produced on other premises (other than sewerage waste) is stored, reprocessed, treated or irrigated.	16,000 tonnes per annual period
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.	90,000 tonnes per annual period
Category 62: Solid waste depot: premises on which waste is stored or sorted, pending final disposal or re-use.	14,000 tonnes per annual period
Category 64: Class II or III putrescible landfill site: premises (other than clean fill premises) on which waste of a type permitted for disposal for this category of prescribed premises, in accordance with the Landfill Waste Classification and Waste Definitions 1996, is accepted for burial.	400,000 tonnes per annual period
Category 67A: Compost manufacturing and soil blending: premises on which organic material (excluding silage) or waste is stored pending processing, mixing, drying or composting to produce commercial quantities of compost or blended soils.	100,000 tonnes per annual period

2.3.2 Part V Division 2 of the EP Act

No clearing of native vegetation is proposed for the construction of Cell 7. The area was previously cleared under clearing permit CPS4471/1.

2.3.3 Planning approvals

The North Bannister Resource Recovery Park has planning approval to operate up to a capacity of 14 cells over a maximum area of 1,000 hectares (ha) with an expected life of 80 years (approximately 32 million tonnes of waste). The Cell 7 landfill expansion is consistent with the existing planning approval for the premises, as approved by the Mid-West/Wheatbelt Joint Development Assessment Panel (JDAP) at its meeting held on 14 December 2017. The detail of the relevant existing planning approval is provided in Table 2 below.

Table 2: Relevant approvals for the application

Legislation	Approval
Planning and Development Act 2005 *Planning and Development (Local Planning Schemes) Regulations 2015*	Granted 14 December 2017 Application: Class II and III waste disposal facility (landfill) and associated facilities and infrastructure Authority: Mid-West/Whealtbelt Joint Development Assessment Panel Proposed expansion approved 14 June 2018

2.3.4 Exclusions to the works approval

Prescribed premises categories that are authorised on the Licence are categories 57, 61, 61A, 62, 64 and 67A. This works approval application seeks authorisation to construct one new landfill cell, which will be constructed and operated under Category 64 within the works approval and subsequently the Licence. No changes to the operational aspects or throughputs to the Licence are being sought by the applicant in relation to categories 57, 61, 61A, 62 and 67A and hence will not be authorised under this works approval. As such, all licenced operations regulated under categories 57, 61, 61A, 62 and 67A, and all associated premises infrastructure associated with these operations, will fall outside of the scope of this works approval.

2.4 Environmental siting

2.4.1 Climate and rainfall

Climatic data was sourced from SILO[1] for the period 1973-2023 for rainfall and evaporation. Figure 2 below summaries the rainfall data experienced at the premises from 1973-2023.

Aspect	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
Average	17	17	19	40	88	125	143	120	78	43	27	12	727
50th Percentile	0	0	57	13	60	154	57	158	109	37	44	35	725
90th Percentile	19	2	0	61	148	181	197	125	136	40	11	0	919
Maximum	8	50	107	61	81	84	312	118	91	102	3	6	1,022

Figure 2: Rainfall Summary in Millimeters

Meteorological data has been summarised from the Wandering weather station (Bureau of Meteorology (BoM) Station ID: 010917), located approximately 28 km southeast of the premises.

Wind data (obtained from Wandering weather station) indicates that winds are predominantly from the north or south-east in the mornings and from the west to north-west in the afternoon. Figure 3 depicts the wind roses as recorded at the Wandering weather station at 9am and 3pm (wind speed in km/h 14 December 1998 to 10 Aug 2024).

[1] SILO | LongPaddock | Queensland Government

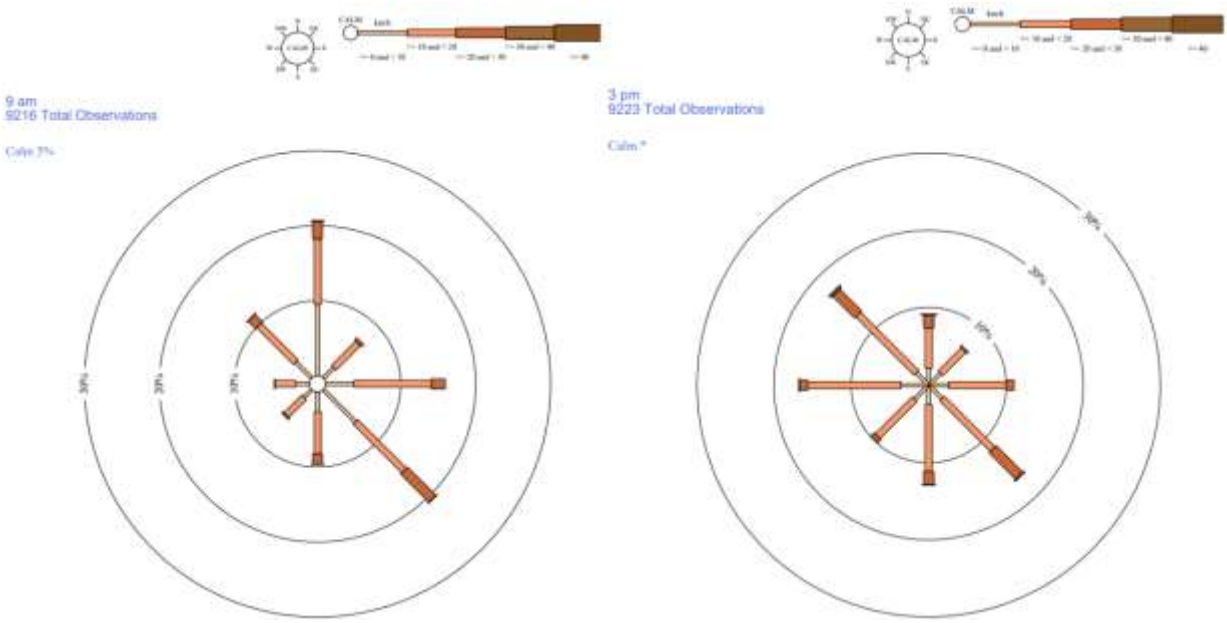

Figure 3: 9am and 3pm wind speed at Wandering

2.4.2 Topography

The topography across the whole premises varies from 310m Australian Height Datum (AHD) to 390mAHD. The highest point at the premises is at Cell 6, located on the western end of the premises. From here, the topography decreases to 315mAHD in the southeastern corner of the premises. The existing topography within the Cell 7 development area ranges from 355mAHD to 370mAHD. The topography of the premises is shown in Figure 4.

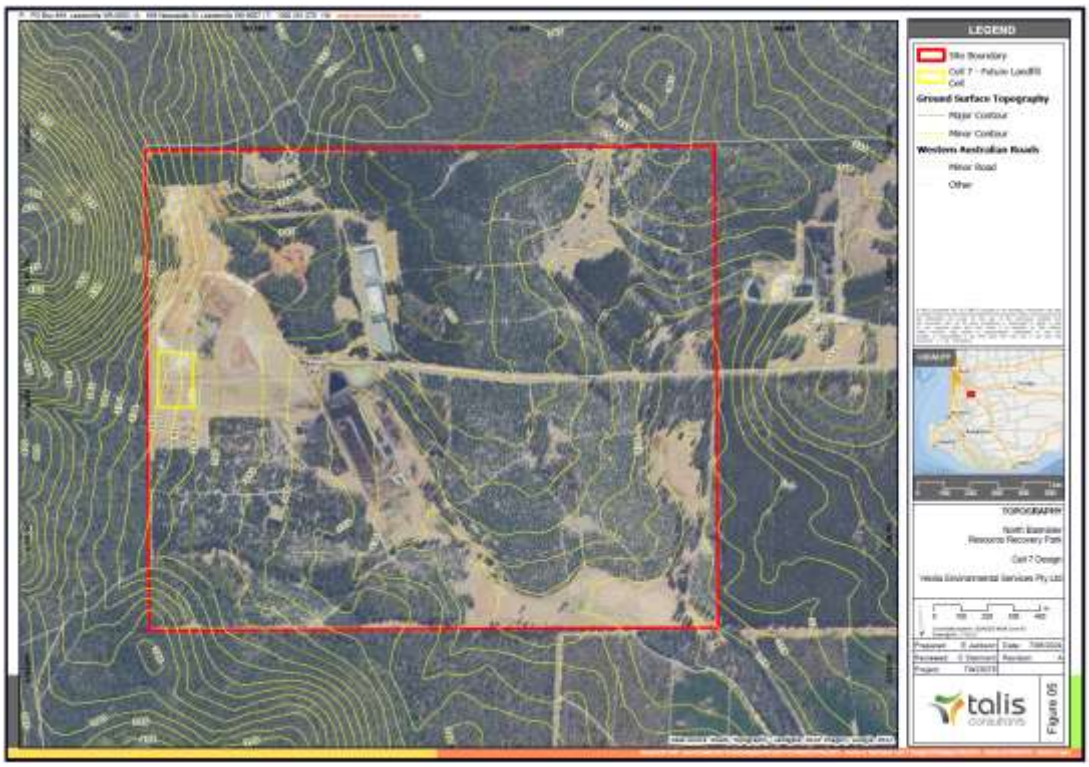

Figure 4: Topography of the premises

2.4.3 Geology

A Geotechnical Investigation by Golder Associates Pty Ltd (Golder) was undertaken in 2017 (Golder, 2017b) to identify the subsurface soil, rock and groundwater conditions at the premises. Based on Golder's review of the Pinjarra 1:250,000 Geological Series Map, the premises is located on the Darling Plateau, to the east of the Darling Fault and over Archean granitic gneissic rocks that form part of the Yilgarn Block.

The landfill and leachate ponds are sited on weathered granite soils and laterite comprising pale brown and red lateritic sands and gravel grading to mottled kaolin-rich clays and silts and firm red and brown clays (GHD, 2018). Where weathering has produced a laterite, is it generally massive and cemented. Local granite outcrops indicate the possibility of faulting within the bedrock beneath the landfill. The faults trend north-westerly to west-north-westerly and are associated with a regional scale lineament swarm within the granite bedrock (Golder, 2018b).

Locally, the weathered basement granites are overlain by shallow dipping sheets of Quaternary colluvial and alluvial sands and gravels with variable amounts of clay (Golder, 2018b). The underlying lithology encountered during onsite well installation (GHD, 2022), is summarised as follows:

- Lateritic pale brown to red sand and gravel from ground level to depths ranging between 3.5m below ground level (bgl) and 21.5mbgl underlain by;
- Soft red and pink to grey and white (mottled) kaolin clays and silts encountered at depths between 5.0mbgl and 25.95mbgl and in some locations underlain by; and
- Firm red and brown to grey and white (kaolinite) clays.

2.4.1 Hydrogeology

In the area of the existing and proposed extension of the landfill footprint, groundwater flow occurs mainly below the lateritic surface within the underlying weathered granitic clays. Based on historical groundwater levels data, the inferred groundwater flow beneath the premises is generally in a southeasterly direction following the topography toward Gringer Creek (6km southeast). Groundwater flow rates within the weathered profile are inferred to be low (<50 m/year) within the upper clay-rich horizons, and are likely to be slightly higher in the weather rock (sandier) horizons over bedrock. Groundwater recharge to basement granites is inferred only where fractured rock intersects drainage lines, or is in contact with the weathered soil profile (Golder, 2018b).

Groundwater quality has been monitored at the premises since 2011. Data gathered from monitoring bores located up-gradient of the landfill development area to date have maintained consistent background concentrations for all water quality parameters.

The results outlined in the 2022/2023 Annual Monitoring Report (Talis, 2023) indicated that groundwater was generally aerobic, acidic and fresh to slightly saline across the premises. Distal down-gradient wells appear to be more saline than up-gradient wells in general. Chemicals of potential concern (COPC) exceeded the adopted assessment criteria were reported in the following wells:

- Up-gradient wells: iron and zinc;
- Proximal down-gradient wells: chloride, total nitrogen (mainly as nitrate) and iron; and
- Distal down-gradient wells: chloride, total nitrogen (mainly as nitrate), iron, manganese, and nickel.

The majority of the COPC exceedances were recorded in down-gradient wells except for iron and zinc. The elevated concentrations of iron were reported in monitoring wells located across the premises including up-gradient wells, potentially reflecting a background condition. In general, the average concentrations of iron, manganese, nickel and zinc in groundwater were

stable or decreased compared to the results in 2021/2022 period, while the average ammonia concentrations declined in the 2022/2023 period.

2.4.2 Hydrology

The premises is located in the Hotham River catchment, on the southern side of a ridge line dividing the Hotham and Upper Serpentine water catchment areas. The gradient of the premises falls steeply from the north-west to the south-east. Surface water (stormwater) is channelled from around the southern and eastern edges of the landfill to three Stormwater Dams, which overflow successively along a natural drainage channel before discharging to Gringer creek, a tributary of the Hotham River, approximately 6 km south of the landfill area (GHD, 2018).

Previous investigations by GHD indicated that surface run-off emanating from the premises is fresh to slightly brackish (444mg/L to 772mg/L) with neutral pH and low metal concentrations in general (Talis, 2023).

2.5 Social and cultural values

2.5.1 Aboriginal heritage

Under Australian Law, Native Title is a form of land title that recognises the unique connections Aboriginal groups have to the land. Native Title exists where Aboriginal people have maintained a traditional connection to their land and waters, since sovereignty, and where acts of government have not removed it. A search of National Map (nationalmap.gov.au) indicates that Native Title does not currently exist over the premises.

Aboriginal Heritage sites (registered or not) are protected under the *Aboriginal Heritage Act 1972* (AH Act). An Aboriginal Heritage Site under Section 5 of the AH Act is defined as:

- any place of importance and significance where persons of Aboriginal descent have, or appear to have, left any object, natural or artificial, used for, or made or adapted for use for, any purpose connected with the traditional cultural life of the Aboriginal people, past or present;
- any sacred, ritual or ceremonial site, which is of importance and special significance to persons of Aboriginal descent;
- any place which, in the opinion of the Committee, is or was associated with the Aboriginal people and which is of historical, anthropological, archaeological or ethnographical interest and should be preserved because of its importance and significance to the cultural heritage of the State;
- any place where objects to which this Act applies are traditionally stored, or to which, under the provisions of this Act, such objects have been taken or removed.

A search for relevant Aboriginal Heritage sites was conducted using the Department of Aboriginal Affairs (DAA) online Aboriginal Cultural Heritage Inquiry System (ACHIS). Reported Aboriginal Heritage sites are categorised according to the assessment status of each place under the AH Act, as listed in Table 3 below:

Table 3: Aboriginal Heritage Site Assessment Categories

Category	Sub- Category	Assessment Status	Protected under
Registered Aboriginal Site	N/A	Site has been assessed as meeting Section 5 of the AH Act	Yes
Other Registered	Lodged	Information has been received. Assessment has not	Yes (temporary)

Category	Sub- Category	Assessment Status	Protected under
Place		been completed to determine if a site meets Section 5 of the AH Act	
	Stored Data/Not a Site	Site has been assessed as not meeting Section 5 of the AH Act	No

The results of the search indicated that the premises is located within an area classified as no Aboriginal Heritage site. The Aboriginal Cultural Heritage (ACH) Registered Place 3582 'Serpentine River' is located 2.5km north of the premises.

2.5.2 European heritage

To protect cultural heritage places in WA, the Heritage Council maintain a list of places that are either 'Statutory Listings' or 'Other Listings and Surveys'. Statutory Listings are heritage places that can affect or may affect the use and development of land and buildings, and Other Listings and Surveys include heritage places that do not have any effect on the use and development of land and buildings.

A search of the WA Government Heritage Council's inHerit online database and the Shire's Municipal Heritage Inventory indicated that there are no European Heritage sites located within or in close proximity to the premises.

3. Landfill engineering and design

3.1 Class III putrescible landfill

Cell 7 will provide approximately 714,446 m^3, or 18-20 months, of additional landfill capacity for the premises. The Cell 7 development area is shown in Figure 5 below.

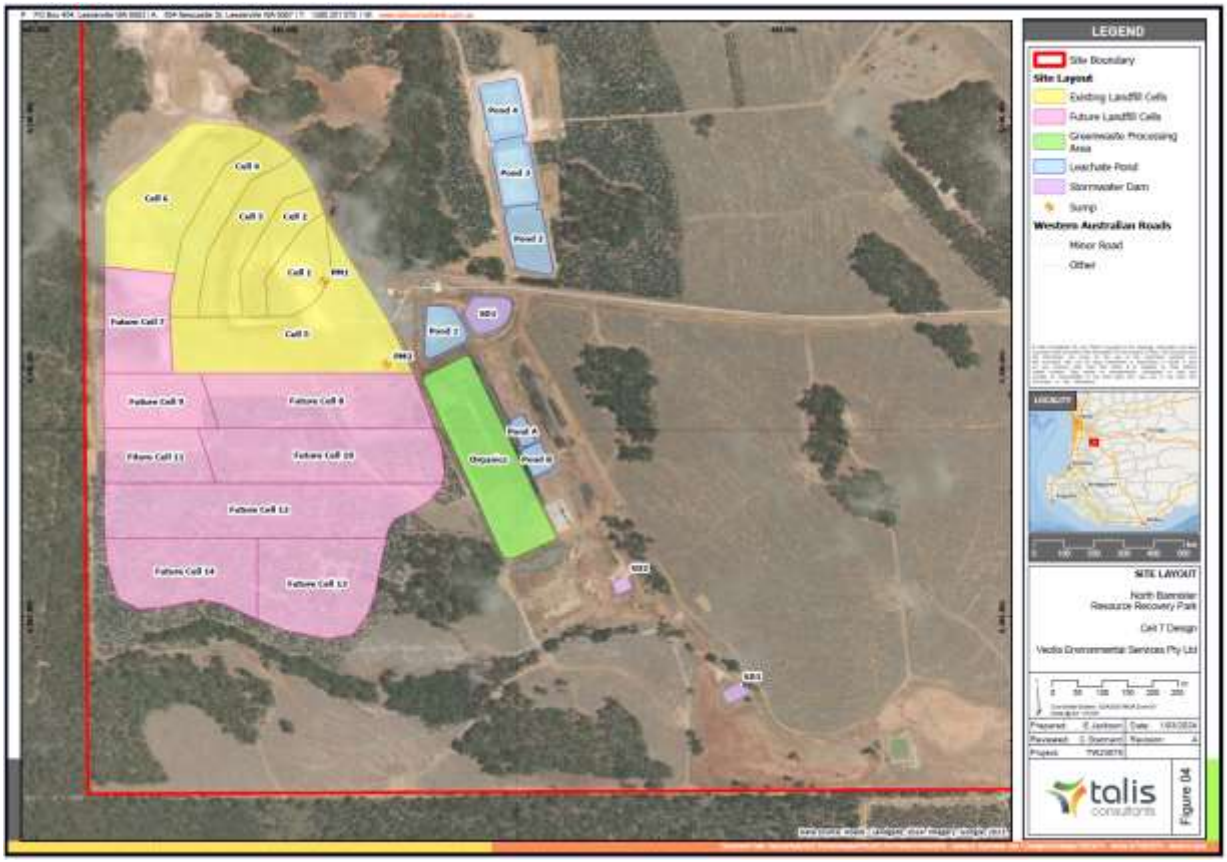

Figure 5: Site layout

3.1.1 Landfill liner design

Veolia develops its cells in general accordance with the Victoria's Environmental Protection Authority (EPA) *Best Practice Environmental Management: Siting, Design, Operation and Rehabilitation of Landfills 2015* (BPEM Guidelines) and New South Wales' (NSW) EPA *Environmental Guidelines Solid Waste Landfills* (NSW EPA Guidelines), collectively referred to as the Landfill Guidelines.

The proposed landfill liner design for Cell 7 consists of the following elements:

- 500mm Engineered Fill Layer;
- Engineered Composite Lining System (in order of construction/installation):
    - Geosynthetic Clay Liner (GCL);
    - 2mm High Density Polyethylene (HDPE) Double Textured Geomembrane;
    - Cushion/Protection Geotextile;
    - Leachate Collection Layer – 300mm highly permeable low calcareous aggregate; and
    - Separation geotextile.

- Environmental Controls:
    - Leachate collection and management system incorporating:
        - DN 225mm HDPE perforated primary pipework; and
        - DN 160mm HDPE perforated secondary pipework.
    - Landfill gas management system incorporating gas wells and gas mains; and
    - Surface water management system consisting of open channel drains and ponds.
- Engineered Landfill Capping System (in accordance with the Landfill Guidelines).

To proactively manage potential construction delays, the applicant has proposed to construct Cell 7 in two separate stages, the advance Bulk Earthworks and the Lining Works. This necessitated the production of two sets of design documentation (i.e., drawings, Technical Specifications, CQA Plans).

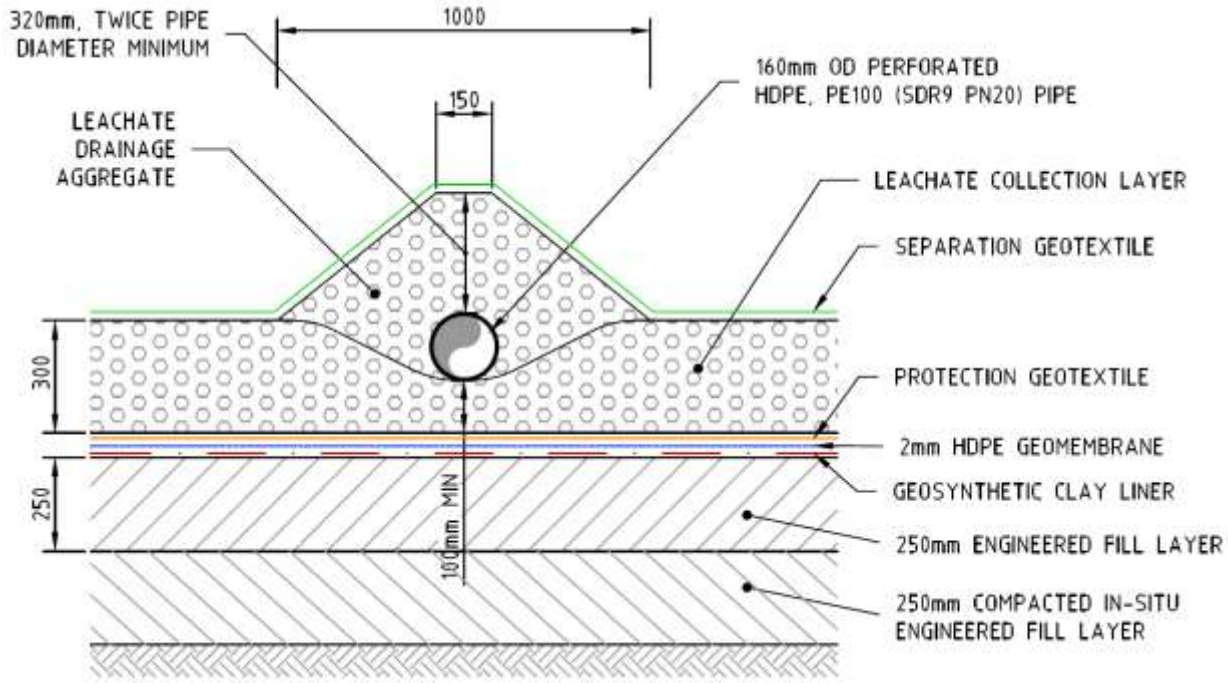

Figure 6: Typical basal lining system

3.1.2 Construction quality assurance

Construction Quality Assurance (CQA) activities will be required to be undertaken during construction of Cell 7. These activities are undertaken by an independent, suitably qualified engineer that is not affiliated with contractors, suppliers or manufacturers. A CQA Plan has been prepared that outlines the CQA requirements including quality assurance procedures and testing methods for construction.

3.1.3 Landfill stability

The geotechnical stability of the landfill is a key factor that may impact the integrity of the landfill environmental controls. Loss of integrity of the landfill liner can result in the contamination of groundwater and soils.

A Landfill Waste Slope Filling Options Assessment was completed in December 2016 by Golder to identify the most appropriate final landform and inform the design of the future landfill cells. The following key conclusions and recommendations were made by Golder:

- The final landform should be designed to have 1:4 pre-settlement slopes and no benching to provide additional airspace and minimise the complexity of filling and capping operations:
- The final landform was identified as complying with the requirements outlined in the Landfill Guidelines; and
- The final landform is based on the assumption that settlement will be approximately 15-20%.

Existing Cells 1 to 6 have been developed in accordance with Golder's design which also included the design of all future cells. The Cell 7 design by Talis (Talis, 2025b) has maintained the same cell footprint but has altered the basal falls to incorporate two spine drains rather than one. This lowers the base slightly in the northwest corner of the cell, but still maintains approximately 5 m offset from maximum recorded groundwater elevation at its lowest point. All basal and side slopes comply with Landfill Guidelines. Site specific engineering controls for the subgrade were developed with consideration of the local groundwater and geology. The cell design features a 500 mm Engineered Fill layer, composite geosynthetic lining system and 300mm leachate collection layer extended to 357 mAHD to manage the potential for leachate to perch against its side slope lining system.

To support the Cell 7 design, Talis (Talis, 2025c) undertook a basal Stability Risk Assessment (SRA). Since the design of Cell 7 features the longest and highest side slopes, of all the proposed future cells at the premises, the SRA assesses the highest risk internal waste slopes for the whole premises. To eliminate the requirement to undertake future analysis of temporary waste slopes for future cell developments, the premises longest and highest temporary waste slope (future Cells 10 and 11) – was also assessed.

The temporary waste slope was found to meet the minimum Factors of Safety (FoS) under static and seismic scenarios. The internal western side slope was found to meet the minimum FoS under static conditions but just under the minimum FoS of 1.0 at 0.989 under seismic loading Safety Evaluation Earthquake (SEE) [Maximum Credible Earthquake - MCE] return periods of 1:1000 Annual Exceedance Probability (AEP) for drained circular and non-circular modes of failure.

The seismic event relates to a statistical occurrence that theoretically takes place once every 1000 years. As the leachate collection layer is exposed for comparatively little time, it will be buttressed by the first 3 layers of waste deposited into the cell within 4 months. The risk of a 1:1000 yr event occurring in a 4 month window is considered very low.

Furthermore, since the SRA was performed using "book values", conservative angle of friction values were applied in the modelling. It is anticipated that laboratory testing of the soils and geosynthetic interfaces can yield higher frictions angles which would lead to FoS above unity during rare seismic events.

The geotechnical stability of the internal and temporary waste slopes is acceptably stable (Talis, 2025). An assessment of the soil characteristics is critical to understanding the stability risks and to confirm the appropriateness of the engineering requirements.

3.1.4 Surface water management

Drainage channels in the form of open swales will be utilised to transport surface water runoff to discharge or collection points for attenuation or diversion offsite. Each landfill cell will have a corresponding perimeter swale to mainly collect surface water that sheds from the landfill's restoration profile following permanent capping works. These swales will connect to existing swales that already direct surface water run-off to the series of surface water ponds around the premises.

3.1.5 Leachate management

To protect the surrounding environment and groundwater from contamination, a leachate collection system will be constructed/installed. The key elements of the lining system are:

- 300mm thick highly permeable low calcareous aggregate leachate collection layer;
- DN 225mm HDPE perforated primary pipework;
- DN 160mm HDPE perforated secondary pipework; and
- Separation Geotextile.

The leachate collection system incorporates an aggregate drainage layer, a network of primary and secondary leachate collection pipes connected by gravity to the existing leachate collection sump in Cell 5. The 300mm thick aggregate drainage layer consists of low calcareous aggregate with a hydraulic conductivity of >1 x 10^{-3} m/s.

The pipe network consists of a DN 160mm HDPE perforated secondary pipes at maximum 25m spacings connected to two DN 225mm HDPE perforated primary pipes which connect into the existing DN 225mm HDPE perforated primary pipe in Cell 5. The base of the cell has been designed with 3% cross falls to two spine drains with 1% and 2% falls orientated diagonally across the cell base which will direct leachate towards the leachate collection sump located in Cell 5. Since Cell 7's leachate drainage system connects to the existing Cell 5 extraction system, an independent extraction system is not required to be developed for Cell 7. The leachate collection system layout for Cell 7 is depicted in Figure 7 below.

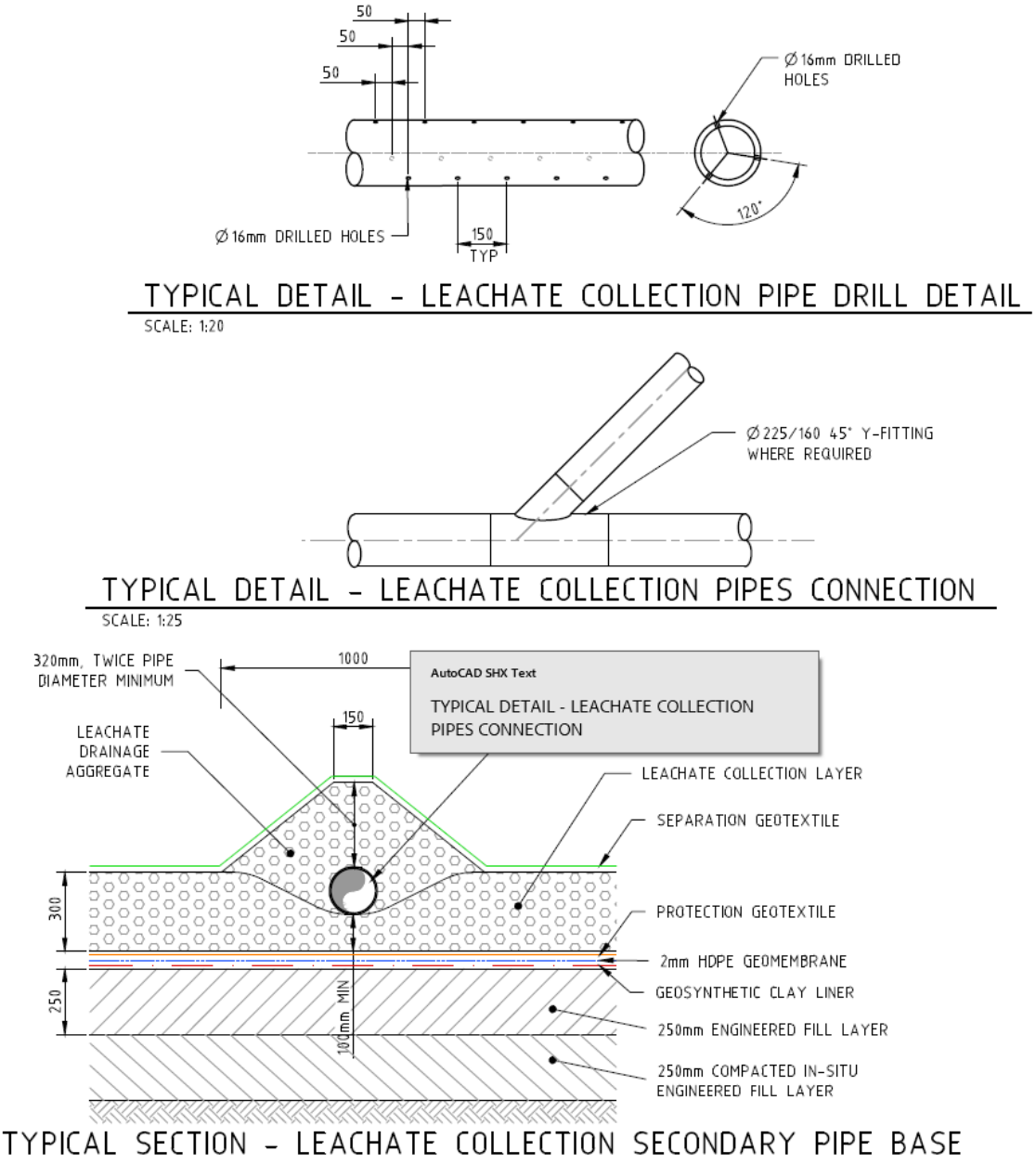

Figure 7: Typical leachate collection details

A leak detection survey will be undertaken on the geomembrane layer following installation of the leachate drainage layer and before the separation geotextile installation. A dipole survey will be conducted over the surface area of the completed leachate drainage layer and on the protection geotextile-covered side slopes in accordance with ASTM D7007 to identify any potential holes in the geomembrane. Any anomalies detected in the underlying geomembrane will be repaired by the Contractor as directed by the CQA consultant.

Talis Consultants was commissioned to assess leachate generation and determine the leachate storage capacity required for the development of the proposed Cell 7 at the North Bannister Resource Recovery Park.

A Water Balance Assessment was utilised to assess the adequacy of the existing leachate evaporation pond capacity and to determine if additional leachate evaporation ponds are required to effectively manage leachate for Cells 1-7. The assessment was undertaken in general accordance with BPEM Guidelines, and uses a Microsoft Excel algorithm to evaluate the system, utilising a simplified input and output system

To assess the adequacy of the leachate management system, the existing pond system was assessed to determine if the existing four pond system can manage the leachate generated in the 'worst-case' scenario (i.e. immediately after the opening of Cell 7) during consecutive wet years, with an additional 1-in-100-year, 24-hour storm event, without overtopping.

Talis, 2024b found that the infrastructure already present at the premises is able to manage its leachate within the existing four pond system over the modelled 5-year worst-case period without the leachate ponds overtopping. The model shows that leachate significantly accumulates during consecutive wet years, and that recirculation of approximately 15,000m^3 each summer period is required to maintain pond levels beneath their operational freeboard. Following from wet years, the pond system is able to rapidly reduce leachate levels, with all four ponds reaching a zero stored leachate volume by the end of the first 'average' year modelled, assuming that recirculation continues over this period.

The water balance also considered a 'storm check', where a 1-in-100-year, 24-hour storm event occurs above regular operating conditions during consecutive wet years to ensure the premises can comply with its Licence. All ponds remain below their operational capacity with this additional storm check during average years and the majority of wet years, however at the end of winter during consecutive wet years, the 800mm freeboard is likely to be exceeded in all ponds should this rare storm event occur. Even if this occurs, levels will still remain below the 300mm overspill freeboard level. This shows that even if such a storm event occurs on top of a consecutive 'wet' years of regular operation in the very short timeframe where the premises is in its 'worst case' scenario, the pond system is still able to handle the generated leachate without overtopping. If necessary, leachate could be recirculated during this period of time to add additional freeboard to the ponds before evaporation increases during the warmer months.

As capping and closure of portions of the landfill are anticipated to commence within the 5 year modelled period, the water balance modelling should be updated to understand potential impacts on the operation of the pond system, and ongoing requirements for leachate management as future cells are developed. It is also noted that a further leachate pond has been approved for construction. Although the current leachate generation and volumes are manageable, further leachate storage provision is available should it be required in to the future.

Key findings:

The Delegated Officer considers that:

- The design specifications of Cell 7 are consistent with the specifications expected for Class III landfill cells. The suitability of the construction in the context of the site's location will be considered in the risk assessment.
- A leachate balance assessment found that the premises infrastructure is able to manage its leachate within the existing four pond system over the modelled 5-year worst-case period without the leachate ponds overtopping.
- A further leachate pond has been approved for construction. Although the current leachate generation and volumes are manageable, further leachate storage provision is available should it be required into the future.

3.1.6 Landfill gas management

There is an existing network of landfill gas extraction wells and pipework across the premises. Through an active management system, the network removes landfill gas from the landfill cells and transfers it to the premises thermal methane destruction flare.

The landfill gas management system for Cell 7 will consist of a series of vertical landfill gas extraction wells spaced consistently across the surface of the cell (typically 50m spacing from a well's centre) which will be connected to the perimeter gas mains. The landfill gas is then directed to the flare under negative pressure induced by the rotary blower. The landfill gas management system for Cell 7 will be finalised at a later stage; however, a general concept design has been developed for the whole landfill as depicted in Figure 8.

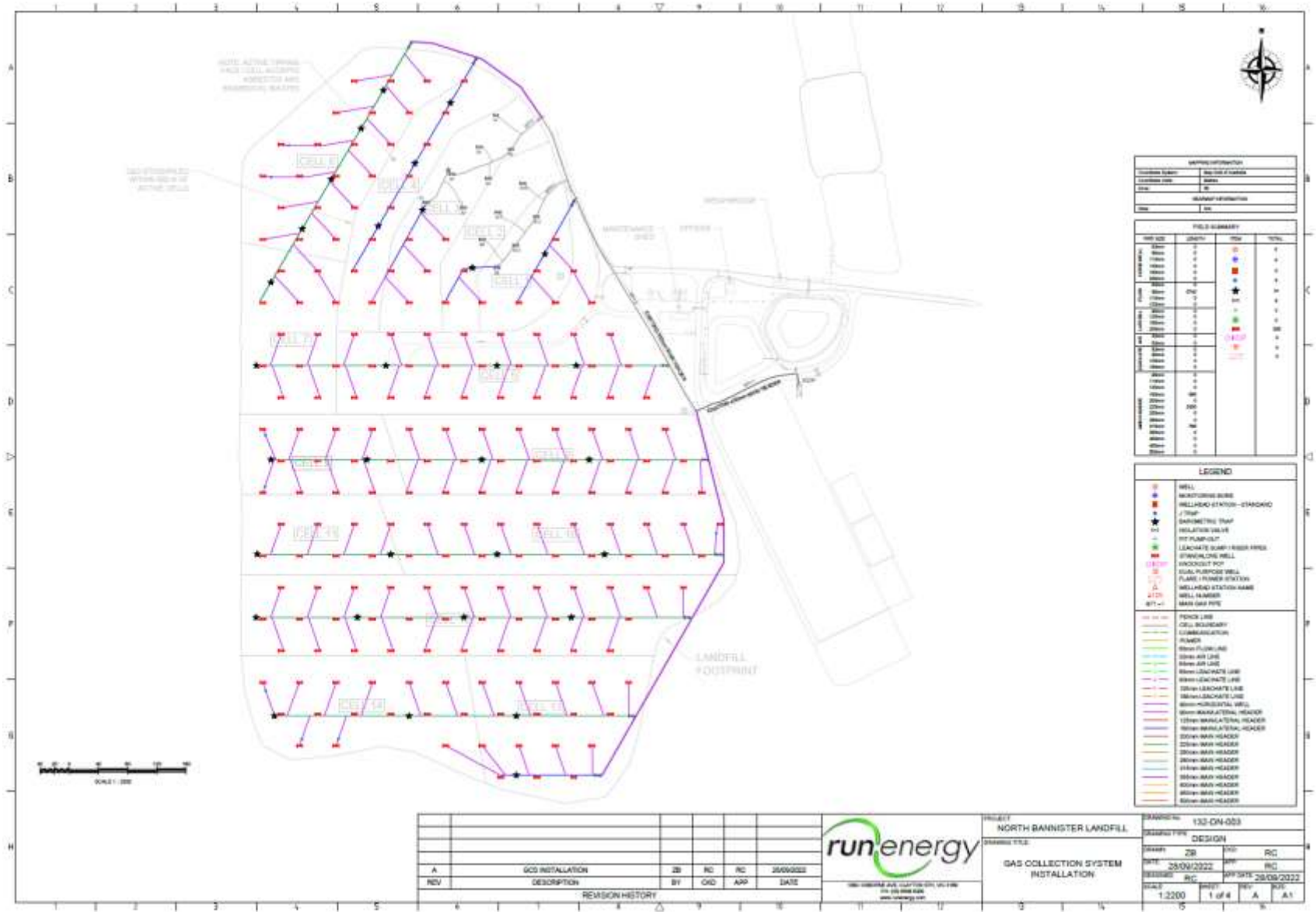

Figure 8: Landfill gas monitoring network

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3.1.7 Cell Closure

As required under Condition 17 of the Part V Licence, a Capping Plan must be prepared three months prior to completion of waste disposal in each cell. The Capping Plan will include further information on the design and material specification for the capping system.

The key objectives of the capping and restoration to be satisfied through these works includes:

- Ensuring that all waste materials are covered to mitigate long term environmental and health risks;
- A restoration profile which will incorporate a low permeability capping layer to restrict the infiltration of rainwater into the waste mass and stop the production of leachate;
- Final fill profile and slopes that are greater than 1V:20H and less than 1V:6H to:
    - Ensure the long term stability and integrity of the capping material and containment layer;
    - Promote the shedding of surface water from the landfill;
    - Provide an aesthetically acceptable landform; and
    - Minimise long term maintenance requirements.
- A system of surface water management to positively deal with any accumulation of the rainwater;
- A gas management regime to control the generation of landfill gases and reduce any significant risk of adversely impacting the surrounding environment;
- Revegetating of the landmass to blend in with the surrounding environment;
- Deliver a suitable post closure land use; and
- Phased closure of the landfill cells as the operational life of the landfill progresses.

Post-closure management will occur following landfill closure, when all waste management activities have ceased, and the premises has been converted to its designated end use. Post-closure management will involve monitoring, maintenance and reporting activities.

It is anticipated that most of the intensive post-closure management will be conducted in the first 10 years after closure, when subsidence, landfill gas, leachate management and revegetation issues will be most prominent.

3.2 Landfill Operation

3.2.1 Waste Acceptance

Cell 7 is classified as Class III and will be licenced to accept the following waste types only, in accordance with the DWER's *Landfill Waste Classification and Waste Definitions 1996 (as amended 2019)* and as per Licence L8871/2014/2:

- Clean Fill;
- Uncontaminated fill;
- Inert Waste Type 1 and Type 2;
- Putrescible Waste;
- Contaminated Solid Waste (meeting criteria specified for Class II or Class III landfills); and
- Special Waste Type 1 and Type 2.

3.2.2 Waste Processing

Upon entering and once weighed, accepted loads will be directed to the designated area for unloading or disposal in the active cell and tip face. The tip face will be clearly signed, and the operator will ensure the load is in the correct location for the materials' appropriate management.

In the event that non-conforming waste materials are discovered within a vehicle, these will be denied access. If asbestos is identified, the asbestos would be removed from the material in accordance with the premises asbestos management procedures. Only cement bonded asbestos and no fibrous asbestos can be accepted at the premises.

Covering the waste will be undertaken in accordance with the Licence requirements. The requirements of cover material will be obtained from the excavated surplus overburden soils. The placement of daily cover will be carried out by the Site staff and plant, as part of the environmental management processes, to discourage vermin and prevent litter, odour, dust emissions and potential impacts on amenity.

3.2.1 Leachate management

The Cell 7 leachate collection system will connect by gravity to the existing Cell 5 collection system for extraction from the Cell 5 and transferred to the existing leachate ponds. Leachate is then treated via evaporation.

The leachate pond system at the premises currently comprises four leachate evaporation ponds with a combined operational capacity of 60ML. The leachate ponds are lined with a composite geosynthetic lining system featuring a 2.0mm HDPE geomembrane overlaying a geosynthetic clay liner (GCL).

Leachate is also abstracted from the leachate pond system for recirculation during the summer months, with water carts recirculating leachate within the landfill footprint, on haul roads and in active filling areas.

As discussed in section 3.1.5 the water balance undertaken found that the premises is able to manage its leachate within the existing four pond system over the modelled 5-year worst-case period without the leachate ponds overtopping.

3.2.1 Stormwater management

During operation, regular site maintenance and repairs of drains and other associated surface water management infrastructure will be undertaken as required. Site staff inspect the system for evidence of contamination, excessive sedimentation and structural integrity of the system on a regular basis. Water within the surface water pond system is monitored in accordance with Licence L8871/2014/2.

4. 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.

4.1 Source-pathways and receptors

4.1.1 Emissions and controls

The key emissions and associated actual or likely pathway during construction and time limited operation which have been considered in this decision report are detailed in Table 4 below. Table 4 also details the control measures the applicant has proposed to assist in controlling these emissions, where necessary.

Table 4: Proposed applicant controls

Emission	Sources	Potential pathways	Proposed controls
Construction			
Dust	Vehicle movements on unsealed surfaces, earthworks, construction and installation of site infrastructure	Air / windborne pathway	Water cart to be used as necessary No construction works or earthworks will take place during high winds Vehicles to maintain minimum speed limits
Noise		Air / windborne pathway	Broadband reversing alarms on mobile machinery Regular maintenance of equipment and machinery Implement safe working practices and use appropriate PPE Sufficient separation distances from sensitive receptors
Contaminated and sediment laden stormwater	Earthworks, construction and installation of site infrastructure	Overland runoff / migration onto surrounding land	Implementation and maintenance of surface water management system consisting of a series perimeter drains to a network of stormwater dams Diversion of water that does not come into contact with waste to surrounding areas Landfill design using the criteria within the Landfill Guidelines for Class III landfills
Asbestos fibres	Exposure of buried waste during the construction works	Air / windborne pathway	Waste operations near the tie-in area were minimised where possible Majority of tie-in area to be cleared of material using machinery to minimise hand excavations All personnel are trained in the appropriate

Emission	Sources	Potential pathways	Proposed controls
			inspection, handling and disposal of asbestos materials
Odour			Waste operations near the tie-in area were minimised where possible
Operation			
Dust	Vehicle movements on unsealed surfaces, earthworks, construction and installation of site infrastructure	Air / windborne pathway	Vehicles to maintain minimum speed limits Use of a water cart as necessary Covering of waste during transport Appropriate handling and unloading of waste to minimise dust generation
Noise	Waste acceptance and handling, disposal of waste, decomposition of wastes, tipping, application of landfill cover and vehicle movements	Air / windborne pathway	All mobile machinery equipped with broadband reversing alarms Site operations hours are restricted to 5:00am to 5:00pm Monday to Friday and 5:00am to 1:00pm on Saturday Regular maintenance of mobile machinery and equipment
Odour	Waste acceptance and handling, disposal of waste, decomposition of wastes, tipping, application of landfill cover and vehicle movements	Air / windborne pathway	Installation of a landfill gas management system Consideration of meteorological conditions during material handling Regular maintenance and monitoring of the leachate treatment system Covering of waste during transport Daily cover and compaction of waste as per the Site Licence Immediate burial of highly odorous wastes on acceptance at weighbridge Odour complaint system and follow-up investigations/actions
Windblown waste	Waste acceptance and handling, disposal of waste, decomposition of wastes, tipping, application of landfill cover and vehicle movements	Air / windborne pathway	Maintenance of fencing 1.8m high Use of litter screens at the tipping face Daily compaction of waste Daily removal of windblown waste from fences and access roads
Pests / vermin / weeds	Waste acceptance and handling, disposal of waste, decomposition of wastes, tipping,	Biological pathway Air / windborne	Application of adequate cover material Regular monitoring for vermin and feral animals

Emission	Sources	Potential pathways	Proposed controls
	application of landfill cover and vehicle movements	pathway	Vermin control such as baiting and trapping
Fire / Smoke	Waste acceptance and handling, disposal of waste, decomposition of wastes, tipping, application of landfill cover and vehicle movements	Air / windborne pathway	Fire response infrastructure and equipment, including mobile water cart, fire extinguishers, stormwater dams, and fire breaks located around the premises As stipulated by Condition 3 of the Licence, an adequate water supply and a means of distribution to be provided at all times for the purposes of firefighting Pursuant to Condition 4 of the Licence, the DWER is informed of any fires by the end of the following working day after which the fire was discovered All staff trained in appropriate fire response techniques
Leachate	Waste acceptance and handling, disposal of waste, decomposition of wastes, tipping, application of landfill cover and vehicle movements	Infiltration into groundwater	Leachate collection system within each landfill cell, designed using the criteria within the Landfill Guidelines, including: • 300mm aggregate drainage layer • Primary and secondary pipe network (225mm and 160mm OD HDPE) • 1-3% base slope • Collection sump Leachate extraction system, including: primary and secondary side risers, submersible pumps, solid HDPE pipe rising main to the centralised leachate pond system Landfill leachate evaporation pond system, consisting of four ponds with a combined operational capacity of 45ML and a combination of both mechanical and floating evaporators. These ponds are lined with a composite, geosynthetic lining system Ongoing monitoring in accordance with the Leachate Management Procedure Progressive landfill capping and restoration
Landfill gas	Waste acceptance and handling, disposal of waste, decomposition of wastes, tipping, application of landfill cover and vehicle movements	Air / windborne pathway Lateral migration through soil Dissolution into	Progressive installation of both horizontal landfill gas wells as part of an active landfill gas extraction system Preparation of a Capping Plan that includes landfill gas collection details

Emission	Sources	Potential pathways	Proposed controls
		groundwater	
Contaminated and sediment laden stormwater	Earthworks, construction and installation of site infrastructure	Overland runoff / migration onto surrounding land	Implementation and maintenance of a surface water management system, consisting of a series perimeter drains to a network of stormwater dams Ongoing surface water monitoring and reporting

4.1.2 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 5 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 5: 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
Commercial premises	Located to the immediate east of the premises
Transient receptors (walkers/track users of Bibbulmun Track)	Located immediately adjacent a section of the northern and western boundary of Lot 2.
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 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 northern premises boundary. A constructed dam has been built to retain surface water onsite. Premises is situated outside 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.

Native remnant vegetation and native fauna habitat	Adjacent to the landfill footprint
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	Numerous 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 River, 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 premises 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.

4.2 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 4.1. 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 4.1), 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 works approval 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 6.

Works approval W2908/2025/1 that accompanies this decision report authorises construction and time-limited operations. The conditions in the issued works approval, as outlined in Table 6 have been determined in accordance with *Guidance Statement: Setting Conditions* (DER 2015).

A licence is required following the time-limited operational phase authorised under the works approval to authorise emissions associated with the ongoing operation of the premises i.e. Cell 7. A risk assessment for the operational phase has been included in this decision report, however licence conditions will not be finalised until the department assesses the licence application.

Table 6: Risk assessment of potential emissions and discharges from the premises during construction and operation

Risk events					Risk rating [1] C = consequence L = likelihood	Applicant controls sufficient?	Conditions of works approval [2]	Justification for additional regulatory controls
Sources / activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Applicant controls**				
Construction								
Vehicle movements on unsealed surfaces, earthworks, construction and installation of site infrastructure	Dust	Air / windborne pathway causing impacts to health and amenity	Residential property 3 km east Commercial property located to the immediate east Transient receptors at site boundary	Refer to Section 4.1.1	C = Minor L = Unlikely Medium Risk	Y	N/A	Emission to be regulated under the general provisions of the EP Act
	Noise			Refer to Section 4.1.1	C = Moderate L = Unlikely **Medium Risk**	Y	N/A	Emissions to be regulated under the *Environmental Protection (Noise) Regulations 1997 (EP Noise Regulations)*
	Odour			Refer to Section 4.1.1	C = Moderate L = Unlikely **Medium Risk**	Y	N/A	Emission to be regulated under the general provisions of the EP Act
	Sediment laden stormwater	Overland runoff potentially causing ecosystem disturbance or impacting surface water quality	Native vegetation and native fauna habitat Serpentine Dam Catchment Area Bannister River Serpentine River Dwellingup State Forrest Beelaring Class C Nature Reserve	Refer to Section 4.1.1	C = Minor L = Possible **Medium Risk**	Y	N/A	Emission to be regulated under the general provisions of the EP Act

Risk events					Risk rating [1] C = consequence L = likelihood	Applicant controls sufficient?	Conditions of works approval [2]	Justification for additional regulatory controls
Sources / activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Applicant controls**				
Operation								
Waste acceptance and handling, disposal of waste, decomposition of wastes, tipping, application of landfill cover and vehicle movements Collection, storage and management of leachate Ongoing management of premises	Dust	Air / windborne pathway causing impacts to health and amenity	Residential property 3 km east Commercial property located to the immediate east Transient receptors at site boundary	Refer to Section 4.1.1	C = Minor L = Unlikely **Medium Risk**	Y	N/A	Emission to be regulated under the general provisions of the EP Act.
	Noise	Air / windborne pathway causing impacts to health and amenity		Refer to Section 4.1.1	C = Moderate L = Unlikely **Medium Risk**	Y	N/A	Emissions to be regulated under the *Environmental Protection (Noise) Regulations 1997 (EP Noise Regulations).*
	Odour	Air / windborne pathway causing impacts to health and amenity		Refer to Section 4.1.1	C = Moderate L = Unlikely **Medium Risk**	Y	Condition 9, 10, 11, 12 and 13	Cover requirements during time limited operations have been added to the works approval in line with the cover requirements of the Veolia Part V licence (L8871/2014/2).
	Windblown waste	Air/windborne pathway causing impacts to amenity	Native vegetation and native fauna habitat Dwellingup State Forrest Beelaring Class C Nature Reserve Commercial property located to the immediate east Transient receptors at site boundary	Refer to Section 4.1.1	C = Minor L = Possible **Medium Risk**	Y	Condition 10, 11, 12 and 13	The Delegated Officer considers that existing windblown waste management controls specified in licence L8871/2014/2 are sufficient in mitigating windblown waste emissions from the operation of Cell 7. These requirements have therefore not been duplicated in the works approval.

Risk events					Risk rating [1] C = consequence L = likelihood	Applicant controls sufficient?	Conditions of works approval [2]	Justification for additional regulatory controls
Sources / activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Applicant controls**				
	Pests / vermin	Biological pathway causing impacts to health and amenity	Native vegetation and native fauna habitat Dwellingup State Forrest Beelaring Class C Nature Reserve Commercial property located to the immediate east Transient receptors at site boundary	Refer to Section 4.1.1	C = Minor L = Possible **Medium Risk**	Y	Condition 10, 11, 12 and 13	The Delegated Officer considers that existing cover requirements specified in licence L8871/2014/2 are sufficient in mitigating pest/vermin emissions from the operation of Cell 7 during time limited operations. These requirements have been added to the works approval.
	Landfill gas	Lateral migration through soil, movement through groundwater, or passive venting to air causing impacts to human health, amenity or explosion risk	Native vegetation and native fauna habitat Dwellingup State Forrest Beelaring Class C Nature Reserve Commercial property located to the immediate east Transient receptors at site boundary	Refer to Section 4.1.1	C = Severe L = Unlikely **High Risk**	N/A	N/A	The construction and operation of landfill gas management infrastructure network will remove landfill gas from the landfill cell and transfer it to the flare for destruction. Construction of the landfill gas monitoring wells will be assessed and conditioned through a licence amendment once the design and construction specifications have been finalised.

Risk events					Risk rating [1] C = consequence L = likelihood	Applicant controls sufficient?	Conditions of works approval [2]	Justification for additional regulatory controls
Sources / activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Applicant controls**				
	Fire / smoke	Air/windborne pathway causing impacts to health and amenity	Native vegetation and native fauna habitat Dwellingup State Forrest Beelaring Class C Nature Reserve Commercial property located to the immediate east Transient receptors at site boundary	Refer to Section 4.1.1	C = Severe L = Unlikely **High Risk**	Y	Condition 10, 11, 12 and 13	The Delegated Officer considers that existing fire mitigation and management controls specified in licence L8871/2014/2 are sufficient in mitigating fire/smoke emissions from the operation of Cell 7. These requirements have been added to the works approval.
	Leachate	Infiltration into groundwater causing contamination and impacting water quality	Native vegetation and native fauna habitat Serpentine Dam Catchment Area Bannister River Serpentine River Dwellingup State Forrest Beelaring Class C Nature Reserve	Refer to Section 4.1.1	C = Major L = Unlikely **Medium Risk**	Y	Condition 1, 4, 5 **Condition 2, 3, 8, 9**	A leachate collection system has been incorporated into the design of the landfill. Leachate will drain through the waste mass to a leachate collection layer and be directed to the cell 5 sump, whereby leachate will be extracted via pump and transferred to the Leachate Ponds for storage and evaporation. The Delegated Officer considers that the design specifications of Cell 7 are consistent with the specification expected for Class III landfill cells. The delegated Officer notes that: • The hydraulic conductivity of the HDPE landfill liner must achieve a value of $1x10^{-9}$ m/s or less in order to retain leachate; • The geocomposite clay liner, geomembrane and

Risk events					Risk rating [1] C = consequence L = likelihood	Applicant controls sufficient?	Conditions of works approval [2]	Justification for additional regulatory controls
Sources / activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Applicant controls**				
								cushion/protection layer are all subject to CQA requirements; • A separation distance between the base of landfill and groundwater will be maintained; and • The existing infrastructure is able to manage the leachate generated from the construction and operation of Cell 7 within the existing four pond system over the modelled 5-year worst-case period without the leachate ponds overtopping. The Delegated officer notes that a further leachate pond is approved for construction at the premises. Although the current leachate generation and volumes are manageable, the further approved leachate pond provides additional leachate storage provision should it be required in the future. The Delegated Officer therefore considers the risk to receptors from leachate impacts to be acceptable subject to the proposed landfill design and construction requirements.
	Contaminated stormwater	Overland runoff / migration onto surrounding land causing ecosystem disturbance Seepage through soil to groundwater causing contamination and	Native vegetation and native fauna habitat Serpentine Dam Catchment Area Bannister River	Refer to Section 4.1.1	C = Minor L = Possible **Medium Risk**	Y	N/A	Stormwater that comes into contact with waste within Cell 7 will be managed as leachate and transferred to the leachate ponds. Stormwater that falls outside of the landfill cell will be captured in a perimeter swale which will connect to existing swales that already direct surface water run-off to the series of surface water ponds around the premises.

Risk events					Risk rating [1] C = consequence L = likelihood	Applicant controls sufficient?	Conditions of works approval [2]	Justification for additional regulatory controls
Sources / activities	**Potential emission**	**Potential pathways and impact**	**Receptors**	**Applicant controls**				
		impacting water quality	Serpentine River Dwellingup State Forrest Beelaring Class C Nature Reserve					Existing stormwater management infrastructure and ponds are conditioned in licence L8871/2014/2.

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.

5. Consultation

Table 7 provides a summary of the consultation undertaken by the department.

Table 7: Consultation

Consultation method	Comments received	Department response
Application advertised on the department's website on 21/03/2025	None received	N/A
Applicant was provided with works approval and decision report on 2 July 2025	Refer to Appendix 1	Refer to Appendix 1

6. Conclusion

Based on the assessment in this decision report, the delegated officer has determined that a works approval 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.
4. GHD, 2018. *North Bannister Resource Recovery Park Groundwater and surface water monitoring plan*. 2018
5. GHD, 2022. *SUEZ North Bannister Landfill 2021/2022 Annual Monitoring* Report. GHD March 2022.
6. Golder, 2017. *Environmental Impact Assessment for North Bannister Landfill Expansion, Golder Associates.* 2017.
7. Golder, 2017b. *Geotechnical Investigation: Proposed Future Cells North Bannister Resource Recovery Park.* Golder Associates. 2017.
8. Golder, 2018. *North Bannister Resource Recovery Park, Construction Management plan – Cell 5, Cell 6, Leachate Pond 3 and Leachate Pond 4.* March 2018
9. Golder, 2018b. *Environmental Impact Assessment for North Bannister Landfill Expansion. Golder Associates.* 2018.
10. Talis, 2023. *Veolia North Bannister Resource Recovery Park 2022/2023 Annual Monitoring Report.* Talis Consultants, 2023.
11. Talis, 2024a. *Construction Quality Assurance Plan North Bannister Resource Recovery Park – Cell 7 Bulk Earthworks.* Talis Consultants Pty Ltd. November 2024
12. Talis, 2024b. *North Bannister Resource Recovery Park Landfill Leachate Balance Memorandum*. December 2024
13. Talis, 2024c. *Technical Specification North Bannister Resource Recovery Park – Cell 7 Bulk Earthworks.* Talis Consultants Pty Ltd. November 2024
14. Talis, 2025a. *Construction Quality Assurance Plan North Bannister Resource Recovery Park – Cell 7 Lining Works.* Talis Consultants Pty Ltd. January 2025
15. Talis, 2025b. *Environmental Assessment & Management Plan, North Bannister Resource Recovery Park – Landfill Cell 7 Development.* Talis Consultants Pty Ltd. January 2025
16. Talis, 2025c. *Stability Risk Assessment North Bannister Resource Recovery Park Landfill Cell 7 Basal Development.* Talis Consultants Pty Ltd. January 2025
17. Talis, 2025d. *Technical Specification North Bannister Resource Recovery Park – Cell 7 Lining Works.* Talis Consultants Pty Ltd. January 2025

Appendix 1: Summary of applicant's comments on risk assessment and draft conditions

Condition	Summary of applicant's comment	Department's response
Condition 3 Table 3	Remove reference to Axi-Symmetric break resistance as no LLDPE is proposed to be used in the construction of Cell 7.	Updated. The Delegated Officer notes that these CQA testing requirements were supplied by the applicant as part of the CQA reporting requirements. As no LLPDE is proposed to be used in the construction of Cell 7, this requirement has been removed from the works approval.
Condition 7	Request to update the commencement of time limited operations to include that time limited operations may commence "where at least 30 calendar days have passed after submission of the Critical Containment Infrastructure Report for that item of infrastructure as required by Condition 6 has been submitted to the CEO."	Not actioned as requested. The Industry Regulation Guide to Licensing provides in-depth guidance for the environmental licensing framework that applies under Part V Division 3 of the EP Act, including typical CCIR assessment timeframes. For medium and high risk engineered, lined landfill cells the guide to licensing states that operations are halted until an assessment of the CCIR is completed. As soon as the Department completes its assessment of the CCIR and is satisfied that the CCIR is compliant, the Department will notify the works approval holder that they can progress to time limited operations, as appropriate. The Delegated Officer notes that airspace is running out in Cell 6 and will endeavor to review the CCIR report within 30 days.
Condition 9 Table 6	Update DAWR to DAFF to reflect the change in Department name.	Updated. The Licence Holder should include this update as part of a future licence amendment for the operational licence.
Condition 11 Table 7	Update 'Quarantine Waste' to 'Biosecurity Waste' to reflect the terminology change introduced in the *Biosecurity Act 2015*.	Updated. The reference change from "quarantine waste" to "biosecurity waste" in the context of the *Biosecurity Act 2015* occurred as part of the broader legislative transition from the *Quarantine Act 1908* to the *Biosecurity Act 2015*, which came into effect on 16 June 2016.
Condition 13 Table 8	The third bullet point is blank. It is assumed this should be as per the conditions in the current licence.	Updated. The additional dot point has been removed as it was deemed a typographical error.