Licence number L9444/2024/1

Licence holder Matters Enterprises Pty Ltd

Trading as RUBBERGEM

ACN 090 053 384

Registered business address 103 Aberdeen Street

ALBANY 6330

DWER file number DER2024/000271

Duration 07/10/2025 to 06/10/2045

Date of issue 07/10/2025

Premises details Rubbergem

1228 & 1250 Rockingham Road (via Henry St, off Hope Valley Road)

NAVAL BASE 6165

Legal description -

Lot 18 and Lot 19 on Diagram 19020

Lot 18 Certificate of Title Volume 1193 Folio 623 Lot 19 Certificate of Title Volume 1838 Folio 629 As defined by the coordinates in Schedule 2

Prescribed premises category description (Schedule 1, <i>Environmental Protection Regulations 1987</i>)	Assessed 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	20,000 tonnes per year

This licence is granted to the licence holder, subject to the attached conditions, on 7 October 2025, by:

Steve Checker

Manager, Waste Industries

an officer delegated under section 20 of the Environmental Protection Act 1986 (WA)

Licence history

Date	Reference number	Summary of changes
07/10/2025	L9444/2024/1	Licence granted

Interpretation

In this licence:

- (a) the words 'including', 'includes' and 'include' in conditions mean "including but not limited to", and similar, as appropriate;
- (b) where any word or phrase is given a defined meaning, any other part of speech or other grammatical form of that word or phrase has a corresponding meaning;
- (c) where tables are used in a condition, each row in a table constitutes a separate condition;
- (d) any reference to an Australian or other standard, guideline, or code of practice in this licence:
 - (i) if dated, refers to that particular version; and
 - (ii) if not dated, refers to the latest version and therefore may be subject to change over time;
- (e) unless specified otherwise, any reference to a section of an Act refers to that section of the EP Act; and
- (f) unless specified otherwise, all definitions are in accordance with the EP Act.

NOTE: This licence requires specific conditions to be met but does not provide any implied authorisation for other emissions, discharges, or activities not specified in this licence.

Licence conditions

The licence holder must ensure that the following conditions are complied with:

Construction phase

Infrastructure and equipment

- **1.** The licence holder must:
 - (a) install the equipment;
 - (b) in accordance with the corresponding installation requirements; and
 - (c) at the corresponding infrastructure location; and
 - (d) within the corresponding timeframe,

as set out in Table 1.

Table 1: Installation requirements

	Equipment	Installation requirements	Equipment location	Timeframe
1.	Flame detectors	Flame detectors (or equivalent) installed to: (a) provide complete coverage of all storage areas within the open yard (b) be connected to a Direct Brigade Alarm (DBA) to alert the local brigade when temperatures reach exceedance levels.	External storage areas (open yard) as depicted in Figure 2 and Figure 3 of Schedule 1.	To be installed and operational by 1 January 2026.
2.	Fire hose reels	Fire hoses must be installed to reach to all areas of the open yard.	External storage areas (open yard) as depicted in Figure 2 and Figure 3 of Schedule 1.	To be installed and operational by 1 February 2026.
3.	Direct Brigade Alarm (DBA) connection	Automatic fire detection system to be connected to a Direct Brigade Alarm (DBA) to immediately alert local Fire Emergency Services of a fire event.	Workshop and Equipment store as depicted in Figure 2 and Figure 3 of Schedule 1.	To be installed and operational by 1 January 2026.

Compliance reporting

- 2. The licence holder must within 30 calendar days of an item of infrastructure or equipment required by condition 1 being installed:
 - (a) undertake an audit of their compliance with the requirements of condition 1;
 - (b) prepare and submit to the CEO an Environmental Compliance Report on that compliance.

- **3.** The Environmental Compliance Report required by condition 2, must include as a minimum the following:
 - (a) certification by a fire management industry professional that the equipment or component(s) thereof, as specified in condition 1, have been installed in accordance with the relevant requirements specified in condition 1;
 - (b) as constructed plans and a detailed site plan for each item of equipment specified in condition 1; and
 - (c) be signed by a person authorised to represent the licence holder and contains the printed name and position of that person.

Infrastructure and equipment

4. The licence holder must ensure that the site infrastructure and equipment listed in Table 2 and located at the corresponding infrastructure location is maintained and operated in accordance with the corresponding operational requirement set out in Table 2.

Table 2: Infrastructure and equipment requirements

	Site infrastructure and equipment	Ope	rational requirement	Infrastructure location
1.	External yard (open yard) storage area	(a)	Storage areas on sealed hardstand (as depicted in Figure 5 of Schedule 1) to be maintained to achieve a permeability of no greater than 1 x 10 ⁻⁹ m/s or equivalent.	As depicted in Figure 2 and Figure 5 of Schedule 1.
		(b)	Sealed hardstand areas (as depicted in Figure 5 of Schedule 1), to be free of leaks and defects.	
		(c)	Flame detectors (or equivalent) to provide complete coverage of all storage areas within the open yard and to be connected to a Direct Brigade Alarm (DBA) to alert the local brigade when temperatures reach exceedance levels.	
		(d)	To be kept free of rubbish and unauthorised combustible material, including vegetation, at all times.	
		(e)	Fire hoses must reach to all areas of the open yard.	
		(f)	Not to be utilised for shredding or crumbing of rubber, conveyor belt reprocessing, or hot works.	
		(g)	Shredded rubber and rubber crumb not to be stored within the open yard.	
		(h)	Conveyor belt reel off-cuts not to be stored within the unsealed hardstand as shown in Figure 5 of Schedule 1.	
2.	Workshop and	(a)	Automatic fire detection system to be:	As depicted in
	Equipment store		 maintained and operated in accordance with AS 1851. 	Figure 2 and Figure 3 of Schedule 1.
			 maintained and operated as per manufacturer specifications. 	

	Site infrastructure and equipment	Operational requirement	Infrastructure location
		 connected to the central Fire Indicator Panel (FIP). 	
		 maintained and operational at all times. 	
		(b) Automatic fire detection system to be connected to a Direct Brigade Alarm (DBA) to immediately alert local Fire Emergency Services of a fire event.	
		(c) Flooring to be a concrete lined hardstand with a permeability of no greater than 1x10 ⁻⁹ m/s or equivalent.	
		(d) Hardstand to be free of leaks and defects.	
		(e) 6 m clearance to be maintained around the perimeter of the building.	
		(f) 1 m clearance to be maintained internally within the building along paths of travel to exits and firefighting equipment.	
		(g) Not to be utilised for shredding or crumbing of rubber or conveyor belt waste.	
		(h) Rubber crumb stored within the equipment store to be stored in accordance with DFES GN02.	
3.	Reprocessing equipment	 (a) Operated and maintained as per manufacturer's specifications. 	Located within the workshop as
	(DairyGrip machinery)	(b) To be operated within the workshop only.	depicted in Figure 2 and
	,	(c) Weekly inspections of machinery to detect and repair faults and defects.	Figure 3 of Schedule 1.
4.	On site fire management	 (a) Maintain fire extinguishers and fire hose reels in accordance with AS 1851. 	Within the premises
	and prevention equipment	(b) Fire hose reels to cover the entire premises, including the open yard and internal buildings.	boundary as depicted in Figure 1 of
		(c) On-site fire extinguishers must be able to extinguish rubber fires.	Schedule 1.
		(d) Forklifts and other mobile equipment to be fitted with fire extinguishers at all times.	
5.	Site entry points	Two entry / exit points onto the site to be not less than 4 m wide to allow emergency services vehicles access to the site.	As depicted in Figure 4 of Schedule 1.

Waste acceptance

5. The licence holder must only accept onto the premises, waste of a waste type which does not exceed the corresponding rate at which waste is received, and which meets the corresponding acceptance specification set out in Table 3.

Table 3: Types of waste authorised to be accepted onto the premises

Waste type	Rate at which waste is received	Acceptance specification
Inert waste type 2	20,000 tonnes per annual period	Whole, unburnt conveyor belts only

6. The licence holder must ensure that the waste types specified in Table 4 are only subjected to the corresponding processes, subject to the corresponding process limits and/or specifications.

Table 4: Waste processing

	Waste type	Process(es)	Process and storage specifications		
			Short-term (prior to 30 September 2026)	Long-term (from 30 September 2026)	
1.	Inert waste type 2: Conveyor belts	Conveyor belt receipt, handling, storage and reprocessing	To be stored according to the following requirements: (i) Stockpiles not to exceed 3.7 m in height.	To be stored according to the following requirements: (i) Stockpiles not to exceed 3.7 m in height.	
2.	Inert waste type 2: Reprocessed final product	Storage	(ii) A minimum distance of 18 m must be maintained between stockpiles and the western and southern premises boundaries at all times.	(ii) A minimum distance of 18 m must be maintained between stockpiles and the western and southern premises boundaries at all times	
			(iii) A minimum distance of 6 m must be maintained between stockpiles and the northern and eastern prescribed premises boundaries.	(iii) A minimum distance of 6 m must be maintained between stockpiles and the northern and eastern prescribed premises boundaries.	
			(iv) Separated into individual stacks of less than 60 m ² or 12.5 tonnes.	(iv) Separated into individual stacks of less than 60 m² or 12.5 tonnes.	
			(v) Separation distance between individual stacks to be a minimum of 2.5 m.	(v) Separation distance between individual stacks to be a minimum of 2.5 m.	
			(vi) In piles consisting of no more than four stacks, separated by a minimum distance of 4 m.	(vi) In piles consisting of no more than four stacks separated by a minimum distance of 10 m.	

	Waste type	Process(es)	Process and storage specifications		
			Short-term (prior to 30 September 2026)	Long-term (from 30 September 2026)	
			(vii) Stored in the location and arrangement shown in Figure 2 of Schedule 1. Conveyor belts to be reprocessed within the	(vii) Stored in the location and arrangement shown in Figure 3 of Schedule 1. Conveyor belts to be reprocessed within the	
			workshop only as depicted in Figure 2 of Schedule 1.	workshop only as depicted in Figure 3 of Schedule 1.	
3.	Inert waste type 2: Conveyor	Storage	To be stored according to the following requirements within the open yard:	To be stored according to the following requirements within the open yard:	
	belt reel off- cuts		(i) within a 4 m ³ skip bin in the location shown in Figure 2 of Schedule 1.	(i) within a 4 m ³ skip bin in the location shown in Figure 2 of Schedule 1.	
			(ii) shaded from direct sunlight and away from heat or ignition sources.	(ii) shaded from direct sunlight and away from heat or ignition sources.(iii) To be disposed of to an appropriately licensed	
			(iii) To be disposed of to an appropriately licensed facility	facility. (iv) To be stored within the skip bin for no longer	
			(iv) To be stored within the skip bin for no longer than 1 week.	than 1 week. To be removed from the workshop at the end of each	
			To be removed from the workshop at the end of each day, following reprocessing operations.	day, following reprocessing operations.	
4.	Inert waste type 2: Rubber crumb	Storage prior to removal off-site.	(i) To be stored internally in accordance with DFES GN02, within the equipment store only as shown in Figure 2 and Figure 3 of Schedule 1.	Not to be stored on-site.	
			(ii) Stockpile storage height and depth must not exceed 3 m.		
			(iii) All rubber crumb stored within the equipment store to be removed by 1 December 2025.		

Emissions and discharges

- 7. The licence holder must immediately recover, or remove and dispose of, spills of environmentally hazardous materials including fuel, oil, or other hydrocarbons, whether inside or outside an engineered containment system.
- 8. The licence holder must ensure that all material used for the recovery, removal, and/or disposal of environmentally hazardous materials is stored in an impermeable container prior to disposal at an appropriately authorised facility.

Fire and emergency management

- **9.** The licence holder must:
 - (a) erect and maintain suitable fencing to prevent unauthorised access to the site;
 - (b) ensure that any entrance gates to the premises are securely locked when the premises is unattended; and
 - (c) undertake regular inspections of all security measures and repair damage as soon as practicable.
- **10.** The licence holder must install and maintain a sign at the site entrance of the premises that clearly displays the following information:
 - a) hours of site operation;
 - b) contact telephone numbers;
 - c) emergency services contact numbers; and
 - d) warning indicating penalties for fire lighting.
- 11. The licence holder must ensure that no waste is burnt on the premises.
- **12.** The licence holder must ensure that any fire on the premises is extinguished as soon as practicable.
- **13.** The licence holder must immediately notify the CEO of:
 - (a) any fire on the premises; and/or
 - (b) any accident, malfunction or emergency which results or could result in the discharge of contaminated firefighting water or other wastes from the premises.
- **14.** The licence holder must implement the fire and emergency management requirements outlined in Table 5.

Table 5: Fire and emergency management requirements

Management requirement	Fire and emergency management requirements	
Firefighting water containment	During a fire event, firefighting water resulting from fire-fighting activities must be:	
	(i) contained within the premises boundary	
	(ii) prevented from entering the on-site soakwell system.	
	(iii) prevented from entering off-site and on-site sumps and drains, the stormwater system, adjacent premises or exposed soil within or outside the premises.	
	(iv) Firefighting water containment must be deployed as soon as practicable upon activation of the premises fire alarm.	
	(v) Contingency arrangements must exist for the removal of firefighting water by a carrier licensed under the Environmental Protection (Controlled Waste) Regulations 2004, to ensure firefighting water does not discharge to the environment where containment capacity is exceeded.	

- 15. The licence holder must develop, submit to the CEO and implement a Contaminated Firefighting Water Management Plan prepared by a suitably qualified registered civil engineer by 1 December 2025.
- **16.** The Firefighting Water Management Plan required by condition 15 of this licence must include, but not be limited to:
 - (a) engineering solutions for the containment of contaminated firefighting water run-off within the premises boundary during a fire event;
 - (b) how firefighting water will be prevented from entering on-site soakwells, off-site and on-site sumps and drains, adjacent premises and exposed soil within or outside the premises;
 - (c) how staff will be trained to ensure effective firefighting water management procedures are implemented during a fire event; and
 - (d) how firefighting water will be collected and removed from the premises.
- 17. The licence holder must implement and maintain a Fire and Emergency Management Plan prepared by a suitably qualified fire management consultant that is consistent with Australian Standard AS 3745. The plan must include, but not be limited to:
 - (a) notification procedures for fire and major spill incidents;
 - (b) how fires will be prevented, detected, responded to, suppressed, contained and controlled for all approved activities addressing all waste types and for all stages of waste handling, sorting and storage processes;
 - (c) in the event of a fire occurring at the premises, how impacts to the environment and human health will be mitigated;
 - (d) how staff will be trained in fire and emergency response on an ongoing, annual basis;
 - (e) the firefighting equipment and fire response capabilities and responsibilities;
 - (f) a premises map displayed at the front of the premises depicting after-hours contact details, plus the location and layout of:

- (i) fire hose reels, hydrants and isolation points;
- (ii) electrical isolation points;
- (iii) sub-surface drainage infrastructure, including details on flow direction and off-site discharge locations;
- (iv) location of sandbags to be used on external drains (if applicable);
- (v) system shutdown points (if applicable); and
- (vi) fire response crew access / entry points;
- (g) hazmat manifest displayed at front of the premises; and
- (h) how the fire and emergency management requirements in Table 5 will be complied with.
- (i) The licence holder must provide evidence of consultation with the Department of Fire and Emergency Services (DFES) by 24 December 2025, confirming that:
 - (j) provision of DFES advice is relevant to the long-term, continued operation of the facility;
 - (k) the firefighting water supply onsite is adequate to sustain firefighting efforts for an extended period for the long-term operation of the facility; and
 - (I) the storage layout proposed in Figure 2 of Schedule 1 is adequate to support firefighting operational requirements short-term until 30 September 2026.

Monitoring

18. The licence holder must record the total amount of waste accepted onto the premises, for each waste type listed in Table 6, in the corresponding unit, and for each corresponding time period, as set out in Table 6.

Table 6: Waste accepted onto the premises

Waste type	Unit	Time period
Inert Waste Type 2: Conveyor belts	Tonnes	Each load arriving at the premises

19. The licence holder must record the total amount of waste removed from the premises, for each waste type listed in Table 7, in the corresponding unit, and for each corresponding time period set out in Table 7.

Table 7: Waste removed from the premises

Waste type	Unit	Time period
Inert Waste Type 2: Rubber crumb		
Inert Waste Type 2: Shredded rubber		
Inert Waste Type 2: Conveyor reel off-cuts	Tonnes	Each load removed from the premises
Inert Waste Type 2: Conveyor belts deemed unsuitable for reprocessing		
Inert Waste Type 2: Reprocessed final product		

Records and reporting

Records

- **20.** The licence holder must record the following information in relation to complaints received by the licence holder (whether received directly from a complainant or forwarded to them by the department or another party) about any alleged emissions from the premises:
 - (a) the name and contact details of the complainant, (if provided);
 - (b) the time and date of the complaint;
 - (c) the complete details of the complaint and any other concerns or other issues raised; and
 - (d) the complete details and dates of any action taken by the licence holder to investigate or respond to any complaint.
- **21.** The licence holder must maintain accurate and auditable books including the following records, information, reports, and data required by this licence:
 - (a) the calculation of fees payable in respect of this licence;
 - (b) the works conducted in accordance with condition 4, 9, 10 and 14 of this licence;
 - (c) any maintenance of infrastructure that is performed in the course of complying with condition 4 of this licence;
 - (d) monitoring programmes undertaken in accordance with conditions 18 and 19 of this licence; and
 - (e) complaints received under condition 20 of this licence.
- **22.** The books specified under condition 21 must:
 - (a) be legible;
 - (b) if amended, be amended in such a way that the original version(s) and any subsequent amendments remain legible and are capable of retrieval;
 - (a) be retained by the licence holder for the duration of the licence; and
 - (b) be available to be produced to an inspector or the CEO as required.

Reporting

- 23. The licence holder must, within 7 days of becoming aware of any non-compliance with conditions 4 to 14 of this licence, notify the CEO in writing of that non-compliance and include in that notification the following information:
 - (a) which condition was not complied with;
 - (b) the time and date when the non-compliance occurred;
 - (c) if any environmental impact occurred as a result of the non-compliance and if so what that impact is and where the impact occurred;
 - (d) the details and result of any investigation undertaken into the cause of the non-compliance;
 - (e) what action has been taken and the date on which it was taken to prevent the non-compliance occurring again; and
 - (f) what action will be taken and the date by which it will be taken to prevent the non-compliance occurring again.

24. The licence holder must:

- (a) undertake an audit of their compliance with the conditions of this licence during the preceding annual period; and
- (b) prepare and submit to the CEO an Annual Audit Compliance Report in the approved form by 30 June each year.

25. The licence holder must:

- (a) prepare an Environmental Report that provides information in accordance with
- (b) Table 8 for the preceding annual period; and
- (c) submit that Environmental Report to the CEO by 30 June each year.

Table 8: Environmental reporting requirements

Condition	Requirement
7, 8 & 12	Details of any fires or spills at the premises over the previous year, measures taken to put out the fire or contain the spill, and actions taken to store and remove materials used.
18 & 19	Summary of input and output data.
23	Summary of non-compliances reported during the annual period.
20	Complaints summary.

Definitions

In this licence, the terms in Table 9 have the meanings defined.

Table 9: Definitions

Term	Definition	
ACN	Australian Company Number	
Annual Audit Compliance Report (AACR)	means a report submitted in a format approved by the CEO (relevant guidelines and templates are available on the Department's website).	
annual period	a 12 month period commencing from 1 July until 30 June of the immediately following year.	
Australian Standard AS 1670	Australian Standard AS 1670 means Standards Australia AS 1670.1:2018 Fire detection, warning, control and intercom systems - System design, installation and commissioning, Part 1: Fire.	
Australian Standard AS 1851	Australian Standard AS 1851 means Standards Australia AS 1851.2012 Routine service of fire protection systems and equipment.	
Australian Standard AS 2419.1	Australian Standard AS 2419.1 means Standards Australia AS 2419.1 Fire hydrant installations Part 1: System design, installation and commissioning.	
Australian Standard AS 3745	means Standards Australia AS 3745 Planning for emergencies in facilities.	
books	has the same meaning given to that term under the EP Act.	
CEO	means Chief Executive Officer of the department.	
	"submit to / notify the CEO" (or similar), means either: Director General Department administering the Environmental Protection Act 1986 Locked Bag 10 Joondalup DC WA 6919 or:	
	info@dwer.wa.gov.au	
Direct brigade alarm (DBA)	a Department of Fire and Emergency Servies monitoring network service providing a direct data link to the fire brigade in the event of fire.	
department; DWER	means the department established under section 35 of the <i>Public Sector Management Act 1994</i> (WA) and designated as responsible for the administration of the EP Act, which includes Part V Division 3.	

Term	Definition	
DFES	means the Department of Fire and Emergency Services.	
DFES GN02	refers to the Department of Fire and Emergency Services, 2019, Guidance Note GN02 Bulk storage of rubber tyres including shredded and crumbed tyres, Perth.	
discharge	has the same meaning given to that term under the EP Act.	
emission	has the same meaning given to that term under the EP Act.	
Environmental Compliance Report	means a report to satisfy the CEO that the conditioned infrastructure and/or equipment has been constructed and/or installed in accordance with the works approval.	
EP Act	Environmental Protection Act 1986 (WA)	
EP Regulations	Environmental Protection Regulations 1987 (WA)	
Fire and Emergency Management Plan	Fire and Emergency Management Plan means a Fire and Emergency Management Plan that meets the requirements specified in condition 15 of this approval.	
fire management	means a person who:	
consultant	(a) holds a Bachelor of Engineering recognised by Engineers Australia;	
	(b) has a minimum of five years of experience working in a supervisory area of fire control system design, installation and commissioning; and	
	(c) is employed by an independent third party external to the works approval holder's business;	
	or is otherwise approved in writing by the CEO to act in this capacity.	
firefighting water	means water that, in the event of a fire, has been used to extinguish a fire and all materials and combustion products dissolved or suspended within such water, and includes other fire suppressant substances such as foam.	
Inert Waste Type 2	means waste consisting of stable non-biodegradable organic materials such as tyres and plastics which require special management to reduce the potential for fires.	
licence	refers to this document, which evidences the grant of a licence by the CEO under section 57 of the EP Act, subject to the specified conditions contained within.	
licence holder	refers to the occupier of the premises, being the person specified on the front of the licence as the person to whom this licence has been granted.	

Term	Definition	
open yard	means the designated outside area used for storage of combustible material as depicted in Figure 3 in Schedule 1 to this licence.	
pile	as defined in the Department of Fire and Emergency Services, 2019, Guidance Note GN02 Bulk storage of rubber tyres including shredded and crumbed tyres, Perth.	
premises	refers to the premises to which this licence applies, as specified at the front of this licence and as shown on the premises map (Figure 1) in Schedule 1 to this licence.	
prescribed premises	has the same meaning given to that term under the EP Act.	
stack	as defined in the Department of Fire and Emergency Services, 2019, Guidance Note GN02 Bulk storage of rubber tyres including shredded and crumbed tyres, Perth.	
suitably qualified and registered civil engineer	a person who: a) holds a Bachelor of Engineering; and b) has a minimum of five years of working experience in the area of civil engineering	
waste	has the same meaning given to that term under the EP Act.	

END OF CONDITIONS

Schedule 1: Maps

Premises map

The boundary of the prescribed premises is shown in the map below (Figure 1).

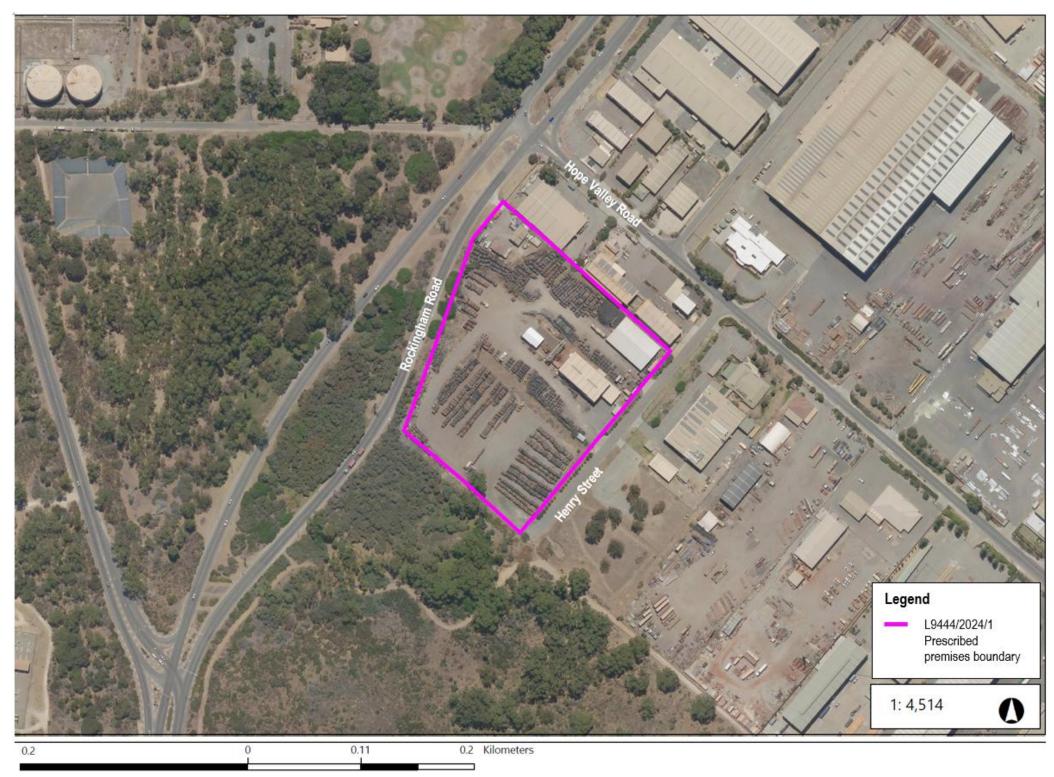


Figure 1: Map of the boundary of the prescribed premises

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Short-term storage and infrastructure map

Site infrastructure and storage layout of waste materials and product is shown in the map below (Figure 2).



Figure 2: Map of site infrastructure including conveyor belt reels, off-cut reels and final product storage locations

Long-term storage and infrastructure map

Site infrastructure and storage layout of waste materials and product is shown in the map below (Figure 3).



Figure 3: Map of site infrastructure including conveyor belt reels, off-cut reels and final product storage locations

Site emergency services entry / exit map

Site entry and exit points for fire emergency services vehicles is shown in the map below (Figure 4).

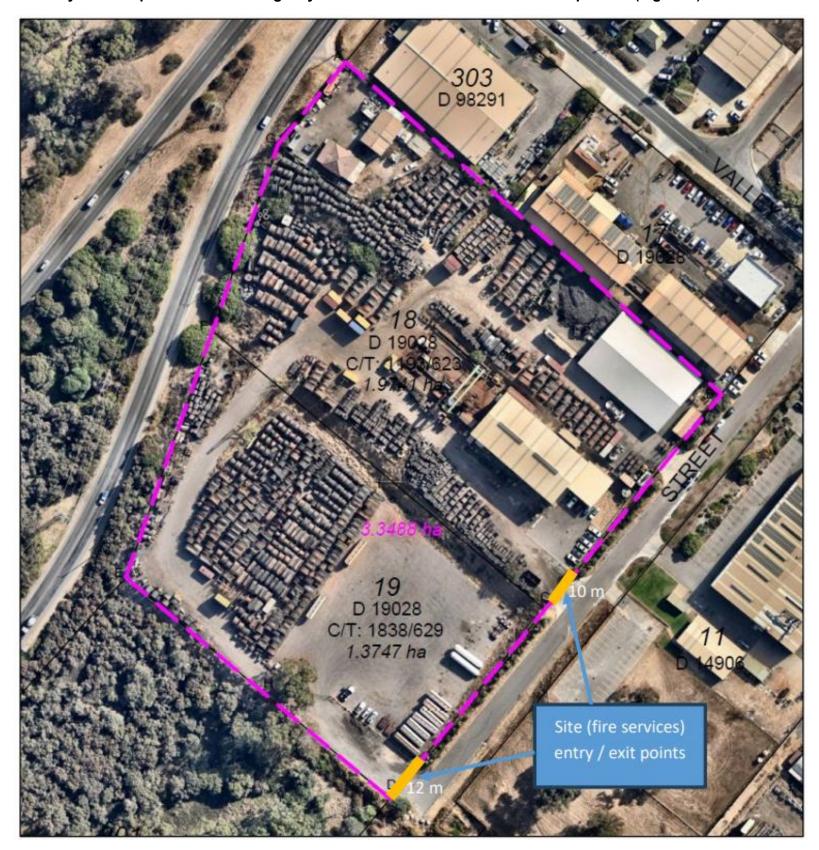


Figure 4: Map of site emergency services entry and exit points.

Hardstand map

Hardstand composition within the premises is shown in the map below (Figure 5).

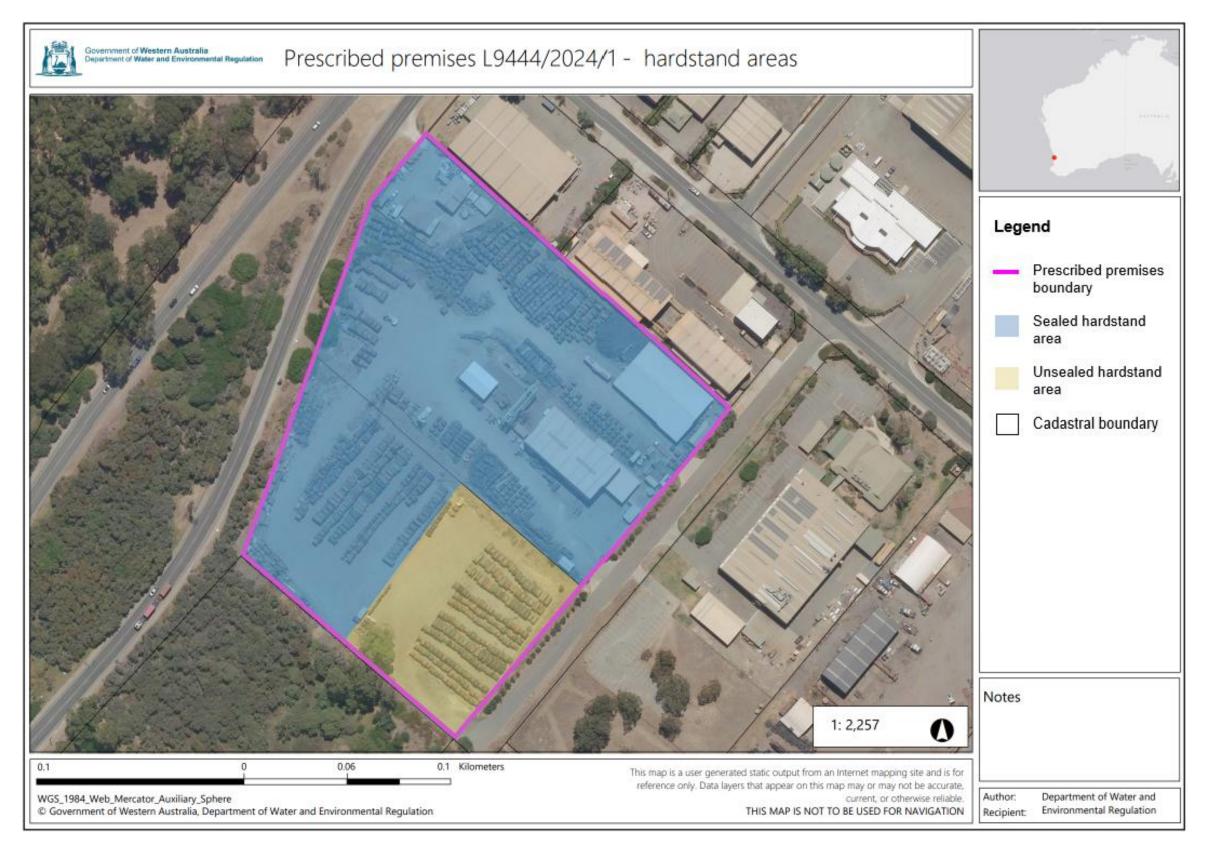


Figure 5: Map of hardstand areas within the prescribed premises boundary

Schedule 2: Premises boundary

The corners of the premises boundary are the coordinates listed in Table 10.

Table 10: Premises boundary coordinates (GDA2020)

	Easting	Northing	Zone
1.	385534.007	6437840.090	50
2.	385676.750	6437713.771	50
3.	385550.760	6437560.010	50
4.	385450.462	6437644.061	50
5.	385508.282	6437808.668	50