Rubber Recycling
29 – 31 Plummer Rd
Laverton North VIC 3026
ABN: 66 880 881 974

Notice of Intent (NOI) – Rubber Recycling's Tyre Processing Facility

Section 27B(2) of the EMPC Act

1) *The name and contact details of the person lodging the application.*

Harry Sinclair – 0408 605 348

2) *The name of the proposed project and its location.*

Project title "*Establishing a tyre recycling facility in Burnie*"

Location: *18-34 Massy-Greene Dr, South Burnie TAS 7320*

Project proponent: Rubber Recycling, located at 29-31 Plummer Rd, Laverton North, Vic, ABN 38 682 684 180, phone 0408 605 348, email info@rubberrecycling.com.au

3) *Background of the project proponent, including details of the proponent's experience and financial capacity to undertake the project and his, her or its contact details.*

Rubber Recycling is an Australian waste rubber recycler, whose extensive truck fleet, custom built equipment, and experienced collections team, facilitates their market leading service. Their facility in Melbourne has been in operation for over five years, and they are now prepared to expand beyond Victoria.

Their multi-million-dollar waste rubber processing facility in Laverton North boasts 24-hour access, several weighbridges, four state-of-the-art shredders, specialised belt handlers and an artillery of heavy machinery able to handle any sized piece of rubber. Drawing upon the Laverton North facilities strengths, they are well positioned to expand into North Tasmania having identified the required machinery to convert pre-processed mining tyres (sourced from Grange Resources) into a valuable product.

Rubber Recycling has been involved in several of the largest waste rubber clean-up jobs in Victoria, including Albury's 350,000 scrap tyre dump and AGL Loy Yang's 3000-ton scrap conveyor belt stockpile. The company is experienced in working with seemingly insurmountable problems and providing cost-effective solutions.

Their main office currently manages not only Victoria, but NSW collections, proving they have the resources available to manage an interstate operation. The facility in Burnie will require one operator, which there are several suitable candidates to fill the role.

4) *A description of the proposed project, including its key physical components.*

The proposed project seeks to target the legacy mining tyre stockpile at Savage River, whilst developing a network of waste tyre producers in Tasmania's North. The main outcome for Tasmania will be the removal of the largest mining tyre stockpile in the state, leading to the elimination of soil contamination, water pollution, and ultimately a catastrophic fire event in the Tarkine, which has been recognized as a site of outstanding national heritage significance.

Through a concerted removal and recycling program, facilitated through the purchasing of mine tyre processing equipment, mining tyres located at Grange Resource's Savage River site will be turned into high calorific value fuels to be utilized within Tasmania and/or abroad.

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By converting waste mine tyres into a specified tyre-derived fuel, Rubber Recycling avoids the likely outcome for these mine tyres, that being landfill, and produces a recovered product for use within the Tasmanian economy.

The project site will feature a mobile shredding unit, excavator, forklift, container loader, generator, mobile tower lights, and fenced boundary.

5) *An outline of the proposed location of the project and a general site location map.*

The site is located within a timber holding yard, which used to be the old paper mill. There are several lay-down areas that we are looking at renting from the owner, to which we have had preliminary discussions with. See "Site Map" document for a general site location.

6) *An outline of the stakeholder consultation process undertaken or proposed to be undertaken, including the consultation method, stakeholders consulted or to be consulted and the issues raised or to be raised.*

Refer to "Stakeholder Consultation Process" document.

7) *A general description of the physical environment that may be affected by the project.*

The physical environment is currently a flattened crushed rock-hard stand and will not be affected by the operations.

8) *The key environmental, health, economic and social issues identified for the project to date.*

Refer to "Key Project Issues" document.

9) *The surveys and studies proposed or underway in relation to the key issues for the project.*

There are no surveys or studies currently proposed to deal with key issues.

10) *The proposed timetable for the project.*

The facility will commence operations in Q1 2027.

For the purposes of section 27B(2)(k) of the EMPC Act, the Board has determined that a NOI should contain the following additional details:

1) *Whether the project requires or is likely to require approval under the Environment Protection and Biodiversity Conservation Act 1999 (the EPBC Act). This will be determined by the project's potential to impact upon Matters of National Environmental Significance or Commonwealth land.*

No, the project does not require approval under the EPBC Act as the operations do not have any potential to impact upon Matters of National Environmental Significance or Commonwealth land.

2) *Whether the proponent has or intends to refer the project to the Australian Government for a determination on whether approval is required under the EPBC Act.*

The proponent does not intend to refer the project to the Australian Government for a determination on whether approval is required under the EPBC Act.

3) *If the proposal has a reasonable likelihood of requiring approval from the Australian Government under the EPBC Act, a statement should be provided as to whether the proponent elects for the proposal to be assessed pursuant to the Bilateral Agreement made under section 45 of the EPBC Act between Tasmania and the Australian Government (dated 22 October 2014).*

Not applicable.

4) *The status of the proposal under the Land Use Planning and Approvals Act 1993 (the LUPA Act).*

Not applicable.

5) *Where the NOI relates to an activity that requires an Environmental Licence under the EMPC Act:*

Not applicable.

Requirements of Section 27B(2) of the *Environmental Management and Pollution Control Act 1994* (EMPCA)

A description of the proposed project, including its key physical components

Provide the following information:

- The proposed maximum amount of tyres (in tonnes) that you are likely to store onsite = under 50 tonnes.
- The proposed maximum amount of other waste (in tonnes) that you are likely to store onsite (if applicable) = under 50 tonnes of other rubber-related waste
- The proposed maximum amount of rubber (in tonnes) to be processed per year = 12,000 tons
- The proposed type/size of tyres = passenger, suv, truck and earthmoving tyres
- The proposed maximum amount of processed rubber (in tonnes) that you are likely to store onsite = under 50 tonnes.
- Further detail on the process including a list of steps. The site will receive pre-processed mining tyres (sheared to a size between 150 – 600 mm pieces) and local garage's whole tyres. Both streams of waste will be processed directly through Rubber Recycling's mobile tyre shredding plant; the plant will shred the tyre waste into a specified size either for use in local and/or overseas markets. The material will be fed into an apron feeder via mechanical means (either an excavator with hydraulic grabs or a material handler with loader bucket), once the tyre waste has passed through the shredder's comminution chamber, it will be specified to a size suitable for utilisation as fuel for local cement manufacturer's or for further processing overseas. The shredded tyres will then be loaded into either trucks or containers by mechanical means to be removed off-site.
- The proposed hours of operation will be 7 am – 4pm, Monday to Friday.

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For the purposes of section 27B(2)(k) of EMPCA, the Board has determined that a NOI should contain the following additional details:

Please add statements addressing all of the points relating to LUPAA.

- A permitted planning permit will be required for the site of *18-34 Massy-Greene Dr, South Burnie TAS 7320*
- A single permit will be required
- The application will likely be assessed under Section 57, as a Level 2 Activity with EPA will make the application a Discretionary Application, in which I had missed taking into consideration with my previous advice
- Zoning: General Industrial Zone
- The proposal does not seek to intensify or alter the existing activity

Site Location
Foreshore Esplanade
Bunnings Burnie
Bunnings EV Accessories
South Burnie
Pulp and Paper Trail
Qube
Emu Bridge Ltd
C112
AJL Yamaha and Lifestyle
- Reserve
Massy-Greene Dr
Emu River
De Bruyn's Transport

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Stakeholder Consultation Process – Rubber Recycling's Burnie Facility

1. Purpose

The purpose of this stakeholder consultation process is to:

- Identify and engage stakeholders affected by or interested in the tyre recycling facility
- Provide transparent, timely information about the proposal, operations, and potential impacts
- Seek and respond to stakeholder feedback
- Build and maintain community trust and social licence to operate
- Meet regulatory and planning approval requirements in Tasmania

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2. Objectives

- Ensure stakeholders are informed and have opportunities to provide input
- Identify potential community, environmental, and operational concerns early
- Incorporate stakeholder feedback into project design and operations where practicable
- Demonstrate compliance with EPA Tasmania and local council consultation expectations
- Establish ongoing communication mechanisms for the life of the facility

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3. Stakeholder Identification

Stakeholders are grouped as follows:

3.1 Regulatory and Government

- EPA Tasmania
- Local Council
- Tasmanian Fire Service
- Local Members of Parliament (where appropriate)

3.2 Community

- Adjacent and nearby landowners and residents
- Local community groups and associations
- Traditional Owners / Aboriginal organisations (if applicable)

3.3 Industry and Commercial

- Tyre suppliers and transport contractors

- Local businesses and industrial neighbours
- Waste and resource recovery partners

3.4 Internal

- Employees and contractors
- Company directors and management

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4. Consultation Principles

The consultation process will be guided by the following principles:

- **Transparency:** Open sharing of accurate and relevant information
- **Early engagement:** Consultation undertaken prior to key decisions
- **Accessibility:** Information provided in plain English and accessible formats
- **Responsiveness:** Feedback acknowledged and addressed in a timely manner
- **Ongoing engagement:** Consultation continues throughout operations, not just approvals

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5. Consultation Stages

Stage 1 – Pre-Application Consultation

Timing: Prior to planning permit and EPA submissions

Activities:

- Initial briefings with council and EPA Tasmania
- Identification of key community stakeholders
- Direct notification (letters or emails) to nearby residents and businesses
- One-on-one meetings with landowners where impacts may occur

Key Topics:

- Nature of tyre recycling operations
- Operating hours and traffic movements
- Noise, odour, dust, and fire risk management
- Environmental controls and monitoring

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Stage 2 – Planning and EPA Assessment Phase

Timing: During formal approvals process

Activities:

- Public information sessions or drop-in meetings (if required)
- Fact sheets distributed to local residents (if required)
- Dedicated project contact (phone/email) for enquiries
- Responses to submissions lodged during public exhibition

Key Topics:

- Environmental safeguards
- Emergency management and fire prevention
- Compliance with Tasmanian regulations
- Community benefit and local employment

Stage 3 – Construction and Establishment

Timing: Site development and commissioning

Activities:

- Updates on traffic, noise, or temporary disruptions (if applicable)
- Engagement with emergency services regarding site layout and access

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Stage 4 – Operational Phase (Ongoing)

Timing: Life of the facility

Activities:

- Ongoing community contact point
- Complaint and enquiry management system
- Regular liaison with regulators and council
- Stakeholder meetings as required

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6. Communication Methods

- Information sheets
- Community meetings / drop-in sessions

- Website or social media updates (if applicable)
- Direct phone contact
- On-site signage with contact details

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7. Feedback and Complaints Management

- All feedback and complaints will be logged in a stakeholder register
- Complaints acknowledged within **5 business days**
- Investigation and response within **10 - 20 business days**
- Corrective actions implemented where required
- Outcomes communicated back to the stakeholder

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8. Documentation and Record Keeping

The following records will be maintained:

- Stakeholder register
- Consultation records and correspondence
- Meeting minutes and attendance lists
- Issues raised and actions taken
- Complaints register and resolutions

These records will be made available to regulators upon request.

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9. Review and Continuous Improvement

- Consultation effectiveness reviewed bi-annually
- Process updated based on stakeholder feedback and operational changes
- Lessons learned incorporated into future engagement activities

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10. Roles and Responsibilities

- **Site Manager:** Primary stakeholder contact and complaint resolution

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1. Environmental Issues

1.1 Fire Risk (Critical Issue in Tasmania)

Why it matters:
Tyres have high calorific value, are difficult to extinguish, and fires can burn for days, producing toxic smoke and contaminated runoff.

Key concerns:

- Stockpile size and separation distances
- Fire water containment and runoff management
- Access for Tasmanian Fire Service
- Proximity to vegetation and bushfire-prone areas
- Compliance with EPA and fire management guidelines

1.2 Air Emissions (Dust, Odour, Smoke)

Sources:

- Tyre shredding and processing
- Vehicle movements on unsealed surfaces

Concerns:

- Nuisance dust affecting nearby residents
- Smoke impacts if thermal processes or fires occur
- Worker and community exposure

Regulatory focus:
EPA Tasmania air quality objectives and nuisance provisions.

1.3 Water and Soil Contamination

Potential risks:

- Leachate from stored tyres (metals, hydrocarbons)
- Firefighting water runoff contamination
- Oil, fuel, and hydraulic fluid spills

Tasmanian considerations:

- High rainfall regions increase runoff risk
- Proximity to waterways, wetlands, or agricultural land

1.4 Noise and Vibration

Sources:

- Shredders, conveyors
- Truck movements

Community concerns:

- Amenity impacts in quiet rural areas
- Early morning or extended operating hours

1.5 Waste Residues and By-products

Issues:

- Storage and transport impacts

2. Health and Safety Issues

2.1 Worker Health and Safety

Key risks:

- Machinery entanglement
- Manual handling injuries
- Exposure to dust and noise
- Fire risk

Controls expected:

- WorkSafe Tasmania compliance
- PPE, training, and safe work procedures

2.2 Public Health

Potential impacts:

- Smoke inhalation in fire events
- Dust or odour affecting sensitive receptors
- Mosquito breeding in stored tyres if not managed

2.3 Emergency Management

Concerns:

- Response capability in remote areas
- On-site fire suppression and detection
- Emergency coordination with TFS, council, and EPA

3. Economic Issues

3.1 Regional Employment and Skills

Benefits:

- Local job creation
- Development of waste and resource recovery skills
- Opportunities for contractors and transport operators

Risks:

- Skills shortages in regional areas
- Reliance on fly-in or interstate labour

3.2 Transport and Logistics Costs

Key challenges:

- Long transport distances from tyre generation points
- Road wear and heavy vehicle impacts

Local concern:

- Increased truck movements through small towns

3.3 Market Stability

Risks:

- Fluctuating demand for recycled products
- Dependence on mainland end-markets
- Policy changes affecting tyre stewardship schemes

3.4 Financial Viability

Issues:

- High capital costs for compliant infrastructure
- Ongoing compliance and monitoring costs
- Stockpile growth risk if markets fail

4. Social and Community Issues

4.1 Community Acceptance (Social Licence)

Concerns:

- Fear of fires and smoke
- Perception of “waste dumping”
- Visual impact of stockpiles

Tasmanian context:

- Strong environmental values
- Smaller communities = higher sensitivity to change

4.2 Amenity Impacts

Key issues:

- Noise, dust, odour
- Traffic safety and congestion
- Visual appearance of the site

4.3 Land Use Compatibility

Concerns:

- Proximity to residential, agricultural, or tourism uses
- Impact on neighbouring property values
- Consistency with planning scheme zoning

4.4 Trust and Transparency

Issues:

- Past failures of tyre stockpiling facilities
- Need for clear communication and accountability
- Long-term commitment to responsible operation