

## Does your business require the new Environment Protection Authority (EPA) Permissions?

The Victorian Automotive Chamber of Commerce (VACC) wishes to inform the Body Repair Division (BRD) and the Towing Operator Division (TOD) members of new EPA permissions requirements.

### What is a permission?

Under the new Environmental laws, if you perform certain activities at your site that may cause harm to human health and the environment, you must have permission from the EPA to do so, such as a **licence** (high risk), **permit** (medium risk) or **registration** (lower risk).

### Why permissions might apply to your business?

Businesses undertaking the activity of **receiving, storing, or processing waste generated at another site** (excluding reportable priority waste (transport)) for the purpose of resource recovery or off-site transfer or disposal will require a [licence](#), [permit](#) or [registration](#). This all depends on the size of the amount of waste your business either receives or stores.

**End-of-Life Vehicles (ELV's) are now classified as 'industrial waste'. VACC sought clarification from EPA Victoria and have been advised that ELVs are classified as industrial waste from the moment they are assessed and declared as either a Statutory Write-off (SWO) or Repairable Write-off (RWO) vehicle. They must *only* go to a 'lawful place'. Therefore, facilities storing more than 5 cubic metres of waste (including ELVs) require either an EPA registration, permit or licence.**

**BRD and TOD members are encouraged to assess how many ELVs they have at their site at any one time. Any number of ELVs stored on your premises can exceed the threshold of 5m<sup>3</sup> of waste. If your site exceeds the threshold, you will be required to apply for a permission as soon as possible. The type of permission you require depends on the type and amount of material stored and processed at your site, Table 1.0 below outlines the different types of permissions available.**

### Example:

A vehicle is dropped off at your holding yard or business to be stored pending an insurance assessment. Once the vehicle is assessed and is determined as a SWO or RWO it is classified as 'industrial waste', that triggers your business obligations to ensure the vehicle irrespective of who is in control of it, is kept in a permissioned 'lawful place'. This includes your business if your site has over 5m<sup>3</sup> of ELV vehicles stored on your site. When the vehicle leaves your business, it can only go to a "lawful place", meaning another business or individual who has either an EPA license, permit or registration. Therefore, a business cannot forward on an SWO or RWO vehicle to someone else, for that person to then dismantle the vehicle in their backyard.

**Table 1.0**

Size of site	Description	Type of permission?
<b>LARGE</b>	A large waste and resource recovery activity includes receiving, storing or processing waste generated at another site, including specified combustible recyclable and waste material, if: <ul style="list-style-type: none"> <li>• 4,000 tonnes or more waste is <b>received</b> in any month, or</li> <li>• 10,000 m3 or more waste is <b>stored</b> on the site at any time</li> </ul>	<b>Licence</b>
<b>MEDIUM</b>	A medium-sized activity includes receiving, storing or processing waste generated at another site, excluding combustible recyclable and waste material, if: <ul style="list-style-type: none"> <li>• 4,000 tonnes or more waste is <b>received</b> in any month, or</li> <li>• 10,000 m3 or more waste is <b>stored</b> on the premises at any time. Or, receiving, storing or processing waste generated at another site, including specified combustible recyclable and waste material, if:               <ul style="list-style-type: none"> <li>○ less than 4,000 tonnes of waste are <b>received</b> in any month; and</li> <li>○ between 5,000 m3 and 10,000 m3 of waste is <b>stored</b> on the premises at any time.</li> </ul> </li> </ul>	<b>Permit</b>
<b>SMALL</b>	A small-scale activity includes receiving, storing or processing waste generated at another site, including specified combustible recyclable and waste material if: <ul style="list-style-type: none"> <li>• between 5 m3 and 5,000 m3 of waste is <b>stored</b> on the site at any time.</li> </ul>	<b>Registration</b>

### When is the deadline?

Sites must apply for an operating Licence (large facility) or Permit (medium facility) **before 1 October 2021**. For Registrations (smaller facility), you must apply for a permission **before 2 January 2022**. The majority of BRD and TOD member sites that store a number of ELVs at their premises are likely to sit in the 'Registrations' category.

### How do I prepare and apply for a permission?

1. [Check if you need a permission.](#)
2. Sign up to the [new EPA Portal](#) to apply for a permission.
3. Review key guidance on how to apply and what to include in your application for a [licence](#), [permit](#) or [registration](#).
4. There is also [additional guidance](#) for A13 permits for A13a large and A13b medium waste and resource recovery facilities.

Members can contact EPA Victoria for information on the permissions application process at [contact@epa.vic.gov.au](mailto:contact@epa.vic.gov.au) or on 1300 372 842.

If members require any additional information, they are encouraged to contact their industry policy advisor on 03 9829 1142. For advice on the new EPA Laws in Victoria, they are encouraged to contact the VACC OHSE Unit on 03 9829 1265.

### VACC Occupational Health Safety and Environment (OHSE) Unit

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