



Used Lead Acid Battery Community Liaison Committee Meeting

2-December-25

7.00pm

Online - MS Teams

Minutes

Topic

Host

Welcome Committee Members and Visitors	Philip Reichert
Apologies John Ellingham (community member) and Leigh Markham (Hazelwood North Primary School) passed on their apologies for missing tonight meeting.	Philip Reichert
Approval of Minutes from Last Meeting Approved by Lorraine Bull (Latrobe Valley Sustainability Group.	Philip Reichert

Site Progress and Bushfire Preparations: Rachel Irvine-Marshall (Pure): Noting the ongoing water management activities and preparations for the upcoming bushfire season, there have been no significant changes since the last meeting. The team continues to manage onsite water and carry out bushfire readiness work, which are the only notable developments at the site. EPA Submission Progress and Timeline Dr Karlis Baltpurvins (CEO, Pure): Starting with an update on the progress of the EPA submission. Chunxing-Pure still has several outstanding queries to address in relation to the works approval conditions, particularly around the engineering design for a few smaller components of the plant, including the wastewater treatment system. Most of this work is now close to completion, and Chunxing-Pure are in the final stages of preparing the submission to the EPA, with the involvement of an EPA-accredited auditor. Chunxing-Pure had originally aimed to lodge the submission before Christmas, but given the holiday period, we now anticipate submitting it in the early weeks of January. While I can't confirm an exact date, it is expected to be around mid-January. As of today, only three minor outstanding matters remain, and these should be resolved shortly. Lead Smelter Licence Transfer and Emissions Comparison: Dr Karlis Baltpurvins (CEO, Pure): One matter we felt would be relevant to bring to the CLC's attention is the broader context of secondary lead smelting in Australia. Nationally, there are only a small number of secondary lead smelters. To distinguish: • Primary lead smelters process lead concentrate directly from mines. • Secondary lead smelters process recovered lead from battery breakers, which is generally a purer form. Batteries contain lead metal grids and lead sulphate. In the Chunxing-Pure proposed process, we undertake a desulfurisation step, where carbonate is added to convert lead sulphate into lead carbonate. This significantly reduces sulphur dioxide emissions, which have historically been a major issue in traditional lead smelting. Within Australia, there are two other secondary smelters operating: one in Laverton (built in the 1980s) and one in Wagga Wagga. Our Hazelwood facility uses a more contemporary, cleaner design.	Rachel Irvine- Marshall & Karlis Baltpurvins
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In early November, Chunxing-Pure became aware that the long-dormant Laverton site had been sold by its owner, DGL Limited, for around \$7.5 million. A key condition of the sale was the transfer of the existing operating licence. Chunxing-Pure learned today that this licence has now been formally transferred to the new operator, Blue Cell Recycling.

Chunxing-Pure want to highlight the significant differences between their licence limits and the emission standards proposed for our Hazelwood facility. For example:

- **Sulphur dioxide:** our licence limit is 3.5 g/min, compared to 400 g/min at Laverton—around **114 times higher**.
- **Lead emissions:** our limit is 0.103 g/min, compared to 5 g/min at Laverton—nearly **50 times higher**.

Table 1: Comparison of ULAB facility air emission limits: Chunxing Hazelwood v Laverton

Pollutant	CHUNXING CORPORATION HAZELWOOD Development licence (DL000232330) maximum emission rate	BLUECELL RECYCLING LAVERTON Operating Licence (OL000001558) maximum emission rate	Bluecell limit higher than Chunxing?
	g/min	g/min	
Sulphur dioxide	3.5	400	114 times higher
Nitrogen oxides	67	50	similar
PM ₁₀	9.2	12 (as 'particles')	N/A
PM _{2.5}	6		N/A
Lead	0.103	5	49 times higher
Sulphuric acid mist	2.3	50 (as 'acid gases (as SO ₃ ')	~ 22 times higher
Chromium and its compounds	0.015	-	N/A
Arsenic and its compounds	0.012	-	N/A
Cadmium and its compounds	0.00055	-	N/A
Antimony and its compounds	0.004	0.07	18 times higher

This comparison illustrates the challenge of introducing new clean-technology facilities when older, outdated facilities continue to operate under much more lenient conditions. Chunxing-Pure had hoped the licence

transfer might prompt a review of those limits, but the licence has instead been transferred in full and remains valid indefinitely, with an expiry date listed as the year 9999.

Chunxing-Pure wanted the CLC to be aware of this context and to understand the effort that has gone into designing what is effectively a best-practice, low-emission lead refinery.

Comment by Lorraine Bull (Latrobe Valley Sustainability Group)- Surely any business would not be allowed to use this licence legally because of the EPA restrictions at currently.

Dr Karlis Baltpurvins (CEO, Pure): Blue Cell Recycling can legally use the transferred licence. It has been transferred in its existing form and remains valid. Unless the EPA imposes additional restrictions—which Chunxing-Pure are not currently aware of—the licence operates as is. Stacey may have further insight into the regulatory aspects, but based on available information, the licence remains active and usable by the new operator.

Stacey Clarke (VIC EPA)- So a licence transfer is essentially an administrative process. When a business is bought and sold, we look at the legal transfer of the premises and fit and proper person tests for incoming duty holders. In some circumstances it can trigger a full licence review. In other circumstances, it is simply a transfer, with the review to be conducted at a later point—whether in line with industry-wide reviews or our internal workflow.

Regarding this particular site, while the licence has transferred with a perpetual end date, I acknowledge it states that. I will assume that's a technical error, as licences require end dates. This will be raised with the permissions team.

Also, if the new owner wishes to make alterations, upgrades, or process changes, that will likely trigger a development licence process, which would then require a full operational licence review and condition changes.

Regarding the discharge limits Karl presented, that is fair based on licence limits. However, when the licence transfer was applied for, our Western Metropolitan team reviewed recent performance statements, compliance inspections, and pollution reports. A key point is that licensed emission limits do not necessarily reflect actual emissions, as permission holders have an obligation to reduce harmful impacts so far as reasonably practicable under the general environmental duty.

For this site, while they have larger licensed discharge limits, their annual reporting indicates they have been operating well below those limits for some time. A licence review would consider not only updating emission limits but also other conditions on the licence. I appreciate the two plants are quite different in their current requirements.

Question Philip Reichert (Chair)- I'm a bit confused by some of the terminology and what this licence actually is. I'm trying to understand: is this an operating licence?

From an economic standpoint, I get it—the property is worth very little without the licence. But if I, hypothetically, bought this site today, could I start production immediately? Or is this a licence that says, "I am now *permitted to work towards* operating"?

What we've been dealing with for the past few years seems to be a process to get a licence *to test* or *to develop*, and then, if they pass, they can operate later. That's my understanding, and I'm just trying to clarify if that's correct. I may have missed an earlier explanation, so I apologise if this was already covered.

Comment Stacey Clarke (VIC EPA)- I don't know the specific of the Laverton North site, as it's not in my region, so I can't speak about it in great detail.

However, to answer your question generally: if Pure Environment were pursuing a development licence for a completely new, "greenfield" site, that would be a brand-new build.

Regarding the site's value, I don't know if it would be accurate to say the Laverton North site is worthless without the licence. The site still exists with all its equipment and technology in place.

When a business closes down, it has options. It can decommission its plant and surrender its licence to the EPA. From a purely EPA perspective—setting aside planning matters—they can surrender the licence, decommission the plant, and make the site safe under the Environment Protection Act.

In this case, it appears the business was sold along with all its plant, equipment, and the licence—since the licence hadn't been surrendered. Therefore, the new operator applied for a transfer of the Environment Protection operating licence under the Act, and it was transferred from the previous duty holder to the new one.

Comment Philip Reichert (Chair)- thank you. So, in my head then: this facility has been switched off for 10 or 15 years. It now has an operating licence, so the new owner can just turn the switch on and proceed.

Public Access to EPA Compliance Information

Question Dr Lakshman Jayaweera (Pure-Chunxing): one question for Stacey regarding the licence: if the new operator proceeds, will there be any requirement to submit updated reports or performance data to the EPA, and will that information be made publicly available?

Comment Stacey Clarke (VIC EPA)- If they do begin operations, they will be subject to their licence conditions, which the EPA monitors through regular licence compliance assessments, typically on an annual basis. They would also be required to submit annual statements each year. Additionally, there could be pollution incident reports that we would respond to.

Regarding public access: none of these reports are automatically public. The annual performance statements *may* be public documents—I believe they were under the old legislation, but I'm not 100% sure under the new framework.

All other documents are not publicly available but could be subject to Freedom of Information (FOI) requests. Releasing information through FOI is, of course, governed by its own set of legislative requirements that we must follow. The licence itself, however, is a public document and is available on our website for anyone who wishes to review it. Question Philip Reichert (Chair)- Stacey, I have a question. I understand the process for Freedom of Information and accessing documents through the website, but I'm wondering: as a representative of the EPA, is there anything you could proactively share with Rachel for the community? Specifically, any information that could help address the points raised by Karlis and Lakshman's behalf, without us having to go through the formal self-service process. If there's anything you can freely provide that would help all of us as a community better understand the situation, that would be greatly appreciated. I completely respect the standard procedures, but I thought it was worth asking. Comment Stacey Clarke (VIC EPA)- if the annual performance statement is a public document, I can certainly take a quick look now and share it with you. However, if it's <i>not</i> considered a public document, then I won't be able to share it directly. The reason it may not be public is that it could contain commercially confidential information. In those cases, release would be subject to a Freedom of Information request and the applicable exemptions. We publish select information from the permission performance statements, so not all of it is publicly available—but portions are. I'll locate that published information and send it through to Rachel. Comment Philip Reichert (Chair)- Thank you Stacey. If you could send through any available information or prompts, we'll include it in the materials. That way, anyone interested can review it at their own discretion	
Next Meeting Date and Agenda Planning Agenda Items, please send to Rachel prior to the meeting The next meeting for 18 February 2026, with Rachel to confirm and update the calendar.	Philip Reichert