



## Annual Audit Compliance Report Form

*Environmental Protection Act 1986, Part V Division 3*

Once completed, please submit this form either via email to [info@dwer.wa.gov.au](mailto:info@dwer.wa.gov.au), or to the below postal address:

Department of Water and Environmental Regulation  
Locked Bag 10  
Joondalup DC WA 6919

Section A – Licence details			
Licence number:	L6092/1972/11	Licence file number:	DEC10716
Licence holder name:	Nufarm Australia Limited		
Trading as:	Nufarm Australia Limited		
ACN:	004 377 780		
Registered business address:	103-105 Pipe Road Laverton North Victoria 3026		
Reporting period:	1 /July /2023      to    30/June /2024		

Section B – Statement of compliance with licence conditions
Did you comply with all of your licence conditions during the reporting period? (please tick the appropriate box)
<input type="checkbox"/> Yes – please complete: <ul style="list-style-type: none"><li>• section C;</li><li>• section D (if required); and</li><li>• sign the declaration in Section F.</li></ul>
<input checked="" type="checkbox"/> No – please complete: <ul style="list-style-type: none"><li>• section C;</li><li>• section D (if required);</li><li>• section E; and</li><li>• sign the declaration in Section F.</li></ul>

Section C – Statement of actual production	
Provide the actual production quantity for this reporting period. Supporting documentation is to be attached.	
Prescribed premises category	Actual production quantity
Category 32 – Pesticides manufacturing	17,791,518L

Section D – Statement of actual Part 2 waste discharge quantity	
Provide the actual Part 2 waste discharge quantity for this reporting period. Supporting documentation is to be attached.	
Prescribed premises category	Actual Part 2 waste discharge quantity
Category 32 – Pesticides manufacturing	Nil

Section E 1 – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	3.4.1	Date(s) of non-compliance:	3 August 2023
Details of non-compliance:			
Nufarm was unable to obtain meaningful water level measurements or obtain water samples from Bore 7 as it had collapsed, in other words the bore was full of soil and sand at the same height as the water level.			
What was the actual (or suspected) environmental impact of the non-compliance?			
<b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
There was no environmental impact that resulted from being unable to measure the water level height in the bore or obtain a water sample from the bore.			
Cause (or suspected cause) of non-compliance:			
The bore had collapsed due to tree root invasion through the perforated bore wall from an adjacent tree, which allowed soil and sand to fill the bore.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Bore 7 (and Bore 8) were installed by Nufarm in 2005 for internal monitoring purposes of their own volition and Nufarm included the analytical results in the Annual Monitoring Report 2007 to 2023 in good faith. In 2014 Bore 7 and Bore 8 were included in the DER Licence Table 3.4.1, at that stage neither DER or Nufarm personnel were aware of the history of Bore 7 or Bore 8.			
Nufarm submitted a Licence Amendment on 12 December 2023 to remove Bore 7 and Bore 8 from the DWER Licence and this was subsequently approved.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, [REDACTED], DWER was advised by e-mail on 14 September 2023			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	

Section E 1 – Details of non-compliance with licence condition	
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 14/September/ 2023

Section E 2 – Details of non-compliance with licence condition
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Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.

Condition no:	Condition 4 Table 1.	Date(s) of non-compliance:	21 June 2024
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Details of non-compliance:

A compliance check against the amended DWER Licence as per Condition 12 (a) found that Scrubber FL-SC-01 was not included in Table 1.

What was the actual (or suspected) environmental impact of the non-compliance?

**NOTE** – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.

The Scrubber was installed in 2011 to improve occupational health working conditions in the Flowables Building. The ventilation network is connected to 4 formulation vessels, de-drumming stations and packaging stations and discharges to atmosphere via the GAC (granular activated carbon) scrubber, extraction fan and 200mm stack. The environmental impact was minimal because (i) the GAC media was replaced every year with fresh material and (ii) Air-stack testing was carried out on the scrubber and the results showed negligible or non-detectible concentrations of the chemicals used in upstream manufacturing.

Cause (or suspected cause) of non-compliance:

All the process details of the site Scrubbers including FL-SC-01 were discussed during meetings with DER personnel prior to the issuing of the DWER Licence in 2014. Scrubber FL-SC-01 was inadvertently omitted from the Licence and not picked up by Nufarm staff at the time. The scrubber has been operated on the basis it was licenced and included whenever air-stack testing by NATA approved contractors occurred on-site.

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:

The scrubber was taken off-line on 21 June 2024. A Licence amendment will be submitted in August 2024 to include Scrubber FL-SC-01 in Table 1 of the DWER Licence. A full compliance check as mandated by the amended DWR Licence Condition 12(a) each year will prevent the reoccurrence of this type of non-compliance.

Was this non-compliance previously reported to DWER?

Yes, [REDACTED], DWER was advised by e-mail on 21 June 2024

<input checked="" type="checkbox"/> Reported to DWER verbally	Date: 21 /June / 2024
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 21/June / 2024

**Section F – Declaration**

I / We declare that the information in this Annual Audit Compliance Report is true and correct and is not false or misleading in a material particular<sup>1</sup>.

I / We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation’s (DWER) website.

Signature <sup>2</sup> :	[Redacted]	Signature:	[Redacted]
Name: (printed)	[Redacted]	Name: (printed)	[Redacted]
Position:	Director	Position:	Secretary
Date:	Jul 22, 2024   16:06 AEST	Date:	Jul 22, 2024   15:53 AEST
Seal (if signing under seal):	N/A		

<sup>1</sup> It is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give information on this form that to their knowledge is false or misleading in a material particular.

<sup>2</sup> AACRs can only be signed by the licence holder or an authorised person with the legal authority to sign on behalf of the licence holder.