



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, 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:	L7316/1996/10	Licence file number:	DEC9037/2
Licence holder name:	Fletcher International Exports Pty Ltd		
Trading as:	Fletcher International Exports Pty Ltd		
ACN:	003 213 652		
Registered business address:	Lot 520 Settlement Road, Narrikup WA 6326		
Reporting period:	01/02/2023 to 31/01/2024		

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">section C;section D (if required); andsign the declaration in Section F.
<input checked="" type="checkbox"/> No – please complete: <ul style="list-style-type: none">section C;section D (if required);section E; andsign the declaration in Section F.

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
15 – Abattoir.	32,702.04 tonne
16 – Rendering.	9724 tonne
62 – Solid Waste Depot.	2379 tonne
67 – Fuel Burning.	9,017.22 tonne
83 – Fellmongering.	1,349,282 skins

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
62 – Solid Waste Depot.	270 tonnes

Section E – 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:	6.	Date(s) of non-compliance:	
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Details of non-compliance:

The company has not submitted a Winter Irrigation Management Plan by the 1st March 2024

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.

Cause (or suspected cause) of non-compliance:

Winter Irrigation Management Plan not submitted by 1st March 2024

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

Quality Assurance & Compliance team are actioning this outstanding item, still in progress and will be forwarded once completed.

Was this non-compliance previously reported to DWER?

Yes, and

Section E – 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:	8.	Date(s) of non-compliance:	
Details of non-compliance:			
The company has not submitted a Nutrient Offtake Strategy by the 1 st March 2024			
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.			
Cause (or suspected cause) of non-compliance:			
Nutrient Offtake Strategy not submitted by 1 st March 2024 by the Company			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Quality Assurance & Compliance team have been tasked to action this outstanding item, currently working on implementing a strategy which will be submitted once completed.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			

Section E – 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:	Table 5	Date(s) of non-compliance:	
Details of non-compliance:			
Ground Water Monitoring Bore Report			
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.			
Cause (or suspected cause) of non-compliance:			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Two Bore hole reports were supplied to the Department previously. We ask that you review this requirement. Fletcher would like to understand why this is a requirement to carry this out on all remaining bore holes. Please Note - GPS positions have been provided for the monitoring bores.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			

Section E – 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:	13	Date(s) of non-compliance:	
Details of non-compliance:			
Environmental Annual Report not submitted by 30th of April 2024			
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.			
No environmental impact			
Cause (or suspected cause) of non-compliance:			
QA Team newly taking over this task after previous Fletcher member left the company.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Quality Assurance and Compliance team better understanding, future EAR will be submitted on time.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			

Department of Water and Environmental Regulation

Section E - 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:		Date(s) of non-compliance:	
Details of non-compliance:			
Annual Audit Compliance Report not submitted by required time.			
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.			
No environmental impact			
Cause (or suspected cause) of non-compliance:			
QA Team newly tasked to the Environmental aspects of the company and hadn't been made aware of this form until overdue reminder email highlighting this issue.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Quality Assurance and Compliance team better understanding, currently working through outstanding items which will sent through upon completion.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			


Section E – 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	Date(s) of non-compliance:	Reporting period Feb 2023-Jan 2024
Details of non-compliance:			
Total nitrogen exceeded the allowable limit of 280kg/ha/annual period for the 2023 – 2024 reporting period.			
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.			
Exceeding allowable limit			
Cause (or suspected cause) of non-compliance:			
Quality Assurance & Compliance Team noted this after reviewing monitoring records in late January where the reading was above 280kg/ha/annum.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The Quality Assurance & Compliance Team are now in charge of the irrigating schedule onsite.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			

Section E – 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:	13	Date(s) of non-compliance:	
Details of non-compliance:			
Flow meter readings and dates they were taken have not been provided for October 2023 to January 2024			
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.			
Cause (or suspected cause) of non-compliance:			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Fletcher acknowledge this was missed and have attached to this updated AACR submission the Flow Meter Readings and Dates as requested			
Refer to attachment A			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			

Section E – 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:	13	Date(s) of non-compliance:	
Details of non-compliance:			
EC Wastewater quality monitoring results have not been provided for November and December 2023.			
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.			
Cause (or suspected cause) of non-compliance:			
Not attached to the EAR submission			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Fletcher have attached the missing report for December to this updated submission, it was noted that during review of the November Lab Report when attaching to this updated AACR there was no EC reported on the report. This was not picked up by the Operator reviewing the reports who we have taken over from.</p> <p>December Lab Report shows EC was reported in the report.</p> <p>This will be monitored closely moving forward and any noted issues with missing test results during Quality Assurance & Compliance Team Lab Report review will be followed up to determine if Lab Error or another sample required for testing.</p> <p>Refer to Attachment B</p>			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			

Section E – 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:	14	Date(s) of non-compliance:	
Details of non-compliance:			
Groundwater quality monitoring monthly SWL, pH & EC have not been provided for groundwater monitoring bores 17A & 17B for October 2023 to January 2024.			
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.			
Cause (or suspected cause) of non-compliance:			
The two groundwater monitoring bores mentioned were present on a map provided many years ago but don't actually exist.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Fletcher has requested previously to have the two listed groundwater monitoring bores 17A & 17B removed however no confirmation of this request has been received.			
There are no bores in place in this location hence no testing completed. There has been no testing of these two mentioned bores in well over 10 years.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			

Section E – 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:	14	Date(s) of non-compliance:	
Details of non-compliance:			
No quarterly groundwater monitoring data has been provided for January 2024			
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.			
No environmental impact			
Cause (or suspected cause) of non-compliance:			
This was missed during submission when attaching Groundwater Lab Result Reports			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The missing report was sent immediately upon realizing the error made. This was an oversight by the Quality Assurance & Compliance Team at the time of submission. Refer to Attachment C			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			

Section E – 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:	15	Date(s) of non-compliance:	
Details of non-compliance:			
<p>No surface water flow or quality monitoring data for SW1 (Millbrook where the waterway enters the premises) has been provided for the reporting period. It should be noted that from October 2023, SW1 samples must be taken at the northern most flowing location within Millbrook.</p> <p>GPS Co-ordinates must also be recorded, which have not been provided as no samples were taken.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p> <p>GPS Co-ordinates for 34°49'50.8"S 117°47'04.2"E</p>			
			
Cause (or suspected cause) of non-compliance:			
<p>No water at SW1 dry Could not access water to take a sample December 2023 & January 2024</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>As a result of poor access to conduct water sampling the company has made an access area to allow for water sampling to occur, the company will continue to sample here if SW1 is dry and as long as access to water is available at this point.</p>			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			

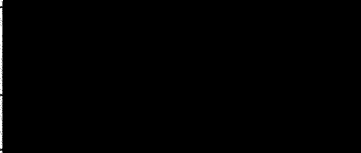
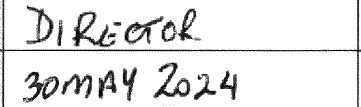
Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	16	Date(s) of non-compliance:	
Details of non-compliance:			
Annual Soil Sampling results have not been provided			
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.			
No environmental impact			
Cause (or suspected cause) of non-compliance:			
Chain of Custody was attached when the Environmental Annual Report was submitted instead of the actual Soil Sample Lab Results Report			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
This was submitted upon realisation the incorrect form was attached. Refer to Attachment D			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			

Section E – 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:	17	Date(s) of non-compliance:	
Details of non-compliance:			
Amount of Organic Solid Waste removed from the premises (each batch removed, in m3 or tonnes) has not been provided for the period October 2023 to January 2024.			
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.			
No environmental impact			
Cause (or suspected cause) of non-compliance:			
Below comment should have been added to the EAR to explain this instead of being left off			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
No organic material has been removed from site during this period of October 2023 to January 2024. It has been noted that material has been removed in the months of March & April this year (2024) which will be reported in this year's reporting period.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			

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 particular¹.

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

Signature ² :		Signature:	
Name: (printed)		Name: (printed)	
Position:	DIRECTOR	Position:	
Date:	30 MAY 2024	Date:	
Seal (if signing under seal):			

¹ 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.

² 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.