



## 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:              | L7426/2000/8   | Licence file number: | 2011/003272-3 |
| Licence holder name:         | RAC Tourism Assets Pty Ltd                                 |                      |               |
| Trading as:                  |  |                      |               |
| ACN:                         | 168 253 085  |                      |               |
| Registered business address: | Monkey Mia Dolphin Resort, Monkey Mia Road, Shark Bay 6537 |                      |               |
| Reporting period:            | 01/04/2023 to 31/03/2024                                   |                      |               |

| Section B – Statement of compliance with licence conditions   |
|---|
| Did you comply with all of your licence conditions during the reporting period?<br>(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 |
| 54 – Sewage facility premises   | 48,383 m <sup>3</sup>      |

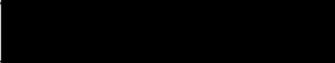
| Section D – Statement of actual Part 2 waste discharge quantity   |  |
|---|--|
| Provide the actual Part 2 waste discharge quantity for this reporting period. Supporting documentation is to be attached. |  |
| Prescribed premises category  | Actual Part 2 waste discharge quantity |
| Not applicable  | Not applicable                         |

| Section E – Details of non-compliance with licence condition   |    |                            |  |
|--|----|----------------------------|--|
| Please use a separate page for each condition with which the license holder was non-compliant at a time during the reporting period.   |    |                            |  |
| Condition no:  | 10 | Date(s) of non-compliance: | July 2023, September 2023, October 2023. |
| Details of non-compliance:   |    |                            |  |
| Exceedance of monthly average of 150m <sup>3</sup> /day of sewage inflow to the wastewater treatment plant in July 2023, September 2023 & October 2023.  |    |                            |  |
| What was the actual (or suspected) environmental impact of the non-compliance?<br><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.  |    |                            |  |
| Nil. Due to the leak being potable water, no additional nutrient load from the leak was placed on the wastewater treatment plant.  |    |                            |  |
| Cause (or suspected cause) of non-compliance:  |    |                            |  |
| A disused and buried capped potable water Hepworth pipe was found to be leaking into a drainpipe directly connected to gravity sewer mains. Leak estimated to be approximately one litre per second. The leak was estimated to have started in June 2023. It was located and repaired in November 2023 at which point the high inflows to the wastewater treatment plant returned to normal. |    |                            |  |
| Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:   |    |                            |  |
| Monthly flow totalizers have now been set up to report at the end of every month to be reviewed by RAC for higher volumes of flow to the wastewater treatment plant.   |    |                            |  |
| Was this non-compliance previously reported to DWER?   |    |                            |  |
| <input type="checkbox"/> Yes, and  |    |                            |  |
| <input type="checkbox"/> Reported to DWER verbally   |    | Date: / /                  |  |
| <input type="checkbox"/> Reported to DWER in writing   |    | Date: / /                  |  |

**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>ii</sup> :     |  | Signature:      |  |
| Name: (printed)               |  | Name: (printed) |  |
| Position:                     |  | Position:       |  |
| Date:                         | 28/06/2024  | Date:           |  |
| Seal (if signing under seal): |   |                 |  |

**Section E – Details of non-compliance with licence condition**

Please use a separate page for each condition with which the license holder was non-compliant at a time during the reporting period.

|               |    |                            |                     |
|---------------|----|----------------------------|---------------------|
| Condition no: | 23 | Date(s) of non-compliance: | July 2023, Jan 2024 |
|---------------|----|----------------------------|---------------------|

Details of non-compliance:

Levels of Enterococci exceeding the allowable limit of MPN/100mL were found in sampling completed in July 2023 at MB2-3, MB3, T2, T3 & RM1, and in January 2024 at MB2-1, MB3, MB4 & MB8.

Levels of Escherichia coli exceeding the allowable limit of 10cfu/100mL were found in sampling completed in: July 2023 at MB4 & MB8 and in Jan 2024 at MB4.

Unfortunately, due to unforeseen circumstances relating to staff resourcing, no repeat samples were taken in accordance with clause 23.

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.

We note that the level of exceedance is minimal and is consistent with sampling contamination results that have been observed in the past.

There has been no visually observed impact to the environment with respect to the native flora and fauna.

The area has been inspected and no leaks have been observed.

| Section E – Details of non-compliance with licence condition  |                  |
|---|------------------|
| <p>Notwithstanding the above comments, RAC still take the matter very seriously.</p>  |                  |
| <p>Cause (or suspected cause) of non-compliance:</p>  |                  |
| <p>We were faced with senior management shortages in 2023 / 2024, due to a staff member requiring over 400 hours of medical leave for critical cancer treatment to address a potentially life threatening illness. This required the staff member to travel and stay in Perth for extended periods of time, which resulted in significant reduction in the availability of senior management resources on property. Due to the criticality of the sampling, we only permit senior management members to complete the sampling to ensure it is done so in accordance with industry best practice. Due to our exceptionally remote location, there is effectively no options to engage 3rd party local resources to complete the sampling on our behalf.</p> <p>With all of this in mind we regrettably were unable to obtain the repeat samples as required under clause 23.</p> |                  |
| <p>Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:</p>   |                  |
| <p>A complete suite of sampling will be completed w/b 1/07/24 and a follow up suite to be completed w/b 15/07/24 to ensure the validity of the sampling and provide consecutive samples in accordance with clause 25. For clarity, the sampling suite will include samples at the sea water sampling locations SW1, SW2, SW3, SW4.</p>  |                  |
| <p>Was this non-compliance previously reported to DWER?</p>   |                  |
| <p><input type="checkbox"/> Yes, and</p>  |                  |
| <p><input type="checkbox"/> Reported to DWER verbally</p>   | <p>Date: / /</p> |
| <p><input type="checkbox"/> Reported to DWER in writing</p>   | <p>Date: / /</p> |

| Section F – Declaration  |            |                 |  |
|--|------------|-----------------|--|
| <p>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>3</sup>.</p> <p>I / We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation’s (DWER) website.</p> |            |                 |  |
| Signature <sup>4</sup> :   |            | Signature:      |  |
| Name: (printed)  |            | Name: (printed) |  |
| Position:  |            | Position:       |  |
| Date:  | 28/06/2024 | Date:           |  |