



## 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:	L8796/2013/1	Licence file number:	2011/004646
Licence holder name:	Bendotti Exporters Pty Ltd		
Trading as:	WA Chips		
ACN:	099 895 904		
Registered business address:	Lot 689 on Plan 175853 Franklin Street Manjimup WA 6258		
Reporting period:	01/01/2022 to 31/12/2022		

### 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)

- Yes please complete:
- section C;
  - section D (if required); and
  - sign the declaration in Section F.
- No – please complete:
- section C;
  - section D (if required);
  - section E; and
  - sign 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
18 Food Processing	9 726 Tonnes

### 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
18 Food Processing	74,456 kL

<b>Section E – Details of non-compliance with licence condition</b>			
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:	3.5.1 (Table 3.5.1)	Date(s) of non-compliance:	January-May 2022, Dec 2022
Details of non-compliance:			
Weekly readings not obtained for discharge limits at L1 for the dates: W/E 15/01, 22/01, 5/02, 12/02, 19/02, 5/03, 12/03, 26/03, 2/04, 9/04, 7/05, 14/05, 21/05, 31/12			
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 actual environmental impact due to this non-compliance because readings do not increase the risk of emissions or discharges; what is discharging will still discharge whether readings are taken or not.			
Cause (or suspected cause) of non-compliance:			
Miscommunication/misunderstanding between new person doing water readings. Was not clear about license requirements and took monthly readings instead of weekly. Non-compliance for W/E 31 <sup>st</sup> December was due to shutdown with normal designated person not on site and not delegating or informing license holder of need to do water reading.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Weekly readings now taken at L1 by designated person on behalf of license holder who understands license requirements from May 2022. License holder will ensure someone is on site to do water readings during shutdown period.			
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 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:	3.5.1 (Table 3.5.1)	Date(s) of non-compliance:	October 2022
Details of non-compliance:			
A Sample, for testing Oil and Grease levels (mg/L), for October was damaged/compromised during storage			
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 actual environmental impact due to this non-compliance because monitoring of Oil and Grease does not increase the risk of emissions or discharges of oil and Grease.			
Cause (or suspected cause) of non-compliance:			
The cause for the damage of the sample is unknown. It may have been tampered with or moved.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Samples stored more securely while awaiting testing.			
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 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:	Schedule 1 Approved Premises Production Capacity	Date(s) of non-compliance:	2022
Details of non-compliance:			
Exceeded Tonnage license limit of 8000T			
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.			
The <i>suspected</i> environmental impact is an increase in emissions at L1 for Total Phosphorus and Total Nitrogen as well as total suspended and dissolved solids.			
Cause (or suspected cause) of non-compliance:			
A misinterpretation of the response from the regulator by License holder to the request for a production increase. License holder incorrectly interpreted conditions outlined in the licence “Amendment Notice 1 DER2017/000224-1 Amendment to License L8796/2013/1...the Notice of Decision to Grant” in respect to fulfilment to and delivery of these <i>as opposed</i> to granting a production increase subject to future delivery of improvements i.e., Licensee took the phrase “decision to grant” as just that.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Waste-Water system upgrade in planning stages.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 12/ 09 /2022	

**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:	2.5.2 (Table 2.5.2)	Date(s) of non-compliance:	2022
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Details of non-compliance:

Exceedances on emissions to land targets for the following during the year 2022:

	Total Nitrogen	Total Phos	Total suspended Solids	pH	Total Dissolved Solids	Oil & Grease	Biochemical Oxygen Demand
	mg/L	mg/L	mg/l	pH units	mg/L	mg/l	mg/l
	10.0	2.0	80.0	6 8.5	1,000.0	5.0	40.0
Jan 2022	12.2		56.0	0.4	200.0	13.0	
Feb 2022			79.0	0.9	500.0	9.0	
Mar 2022			20.0	0.6	630.0	153.0	
Apr 2022	8.4	7.0	200.0		120.0	11.0	
May 2022	19.1	11.5	285.0		650.0	26.0	11.4
Jun 2022	0.0	10.1	60.0		130.0	1.0	
Jul 2022	23.5	0.9	140.0	0.4	70.0	27.0	44.3
Aug 2022	15.7		59.0			57.0	
Sep 2022			99.0			19.0	19.6
Oct 2022	0.1	6.6	25.0		340.0		5.2
Nov 2022	3.2	6.5	24.0		360.0	18.0	
Dec 2022		3.2	26.0	0.6	400.0	13.0	

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.

- Elevated concentrations of Phosphorus and Nitrogen Pollution Nutrient between emissions point L1 and Smith Brook Dam.

Cause (or suspected cause) of non-compliance:

- Inadequate waste-water treatment plant
- Unrealistic emissions to land targets in license.

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

Upgrade of waste-water treatment plant. Upon upgrade of waste water treatment plant revisit emissions to land targets.

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

Was this non-compliance previously reported to DWER?

Yes, and

Reported to DWER verbally

Date: / /

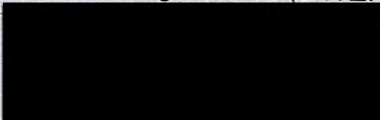

Reported to DWER in writing

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>2</sup> :		Signature:	
Name: (printed)		Name: (printed)	
Position:	GENERAL MANAGER	Position:	
Date:	29/3/2023	Date:	
Seal (if signing under seal):			

<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.