



## 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:	L8807/2013/2	Licence file number:	ILS2013/000004-1
Licence holder name:	Rottnest Island Authority		
Trading as:	Rottnest Island Authority		
ACN:	38 836 160 172		
Registered business address:	1 Mews Rd, Fremantle WA 6160		
Reporting period:	01/07/2024 to 30/06/2025		

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 54 – Sewage Waste Facility	Effluent Inflow: 89,830 m <sup>3</sup> Recycled Water Produced: 89,595 m <sup>3</sup> (4,921 m <sup>3</sup> re-used at WWTP) Bio-Solid Output: 235 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

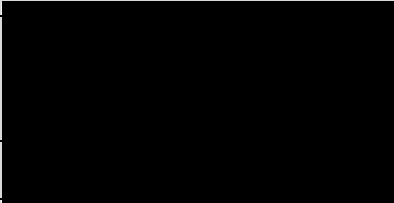

Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	8	Date(s) of non-compliance:	Various across the 2024-2025 period
Details of non-compliance:			
<p>Recycled water was used to irrigate the Oval and Golf course when the baseline soil moisture content was met or exceeded at all monitoring locations at different times during the irrigation months (September – May). This breaches condition 8 of Wastewater Treatment Plant Licence L8807/2013/2.</p> <p>However, it is noted that some of the exceedances represented rainfall events such as several occasions in September, October, and November 2024 and several occasions in April and May 2025.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
There is considered to have been minimal environmental impact from the non-compliance. No visible detrimental impacts to the Oval or Golf course were identified and no observable physico-chemical impacts to the groundwater or surface water data across the reporting period were reported.			
Locations of non-compliance were Probe 2 (September 2024 – May 2025), Probe 3 (January 2025- May 2025), Probe 4 December 2024– March 2025), Probe 6 (September 2024 – May 2025), Probe 7 (September 2024 – May 2025), Probe 8 (September 2024 – May 2025), Probe 9 (September 2024 – May 2025), & Probe 10 (September 2024– May 2025).			
Cause (or suspected cause) of non-compliance:			
Lack of attention paid to the soil moisture data displayed on the IrriMax software system and not ceasing irrigation when the soil moisture baseline content was reached, particularly after rainfall.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>In 2023 RIA contracted a consultant (GHD) to review the moisture levels across the Golf Course. In an advice note provided to RIA in June 2023, GHD provided suggested improvements to the irrigation regime which RIA instructed the maintenance contractor to follow over the 2023-2024-2025 irrigation seasons, however, these improvements were not fully implemented.</p> <p>Separately, DWER conducted an audit of the WWTP and golf course in April 2025 to assess compliance against licence L8807/2013/2. The audit identified the non-compliance related to over-irrigation of the golf course and oval. DWER required RIA to provide an action plan for RIA to become compliant. RIA has contracted another consultant (Sports Turf Technology) to</p>			

Section E – Details of non-compliance with licence condition	
<p>prepare the action plan. Whilst this action plan will only be relevant to irrigation operations in the 2025-2026 irrigation season, it will form a comprehensive plan for RIA to become compliant with the conditions of licence L8807/2013/2.</p> <p>There are set points in place that are intended to be used as a guide to control irrigation to prevent over-irrigation when soil moisture levels are at their full point. This system relies on manual control of the irrigation system which can be overlooked on such occasions as that which occurred in the non-compliance. The maintenance contractor was aware of the measures that needed to be implemented following the non-compliance reported during the previous reporting period, although did not fully implement the recommendations.</p> <p>As noted above, GHD was engaged to review the moisture levels in relation to the set points. To reduce the non-compliances, GHD recommended that greater attention is paid to soil moisture probe data particularly following rainfall events and also to check soil moisture probe data at the sensors below 25cm to assess for leaching beyond the root zone. This follows advice provided to the contractor in previous years regarding the need to irrigate only when soil moisture levels are below the full point.</p> <p>The action plan provided to DWER outlines the measures for RIA to become fully compliant with the conditions of licence L8807/2013/2 moving forward.</p>	
<p>Was this non-compliance previously reported to DWER?</p>	
<p><input checked="" type="checkbox"/> Yes, and</p>	
<p><input checked="" type="checkbox"/> Reported to DWER verbally</p>	<p>Date: 30 / 04 / 2025</p>
<p><input type="checkbox"/> Reported to DWER in writing</p>	<p>Date:</p>

Section E – Details of non-compliance with licence condition			
<p>Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.</p>			
Condition no:	7	Date(s) of non-compliance:	Various across the 2024-2025 period
Details of non-compliance:			
<p>Baseline field capacity measurements were not taken or reported on for sampling locations HA02 and HA11.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
<p>There is considered to have been minimal environmental impact from the non-compliance. Locations HA02 and HA11 were initiated as soil sampling locations in 2017 as part of an investigation by GHD to determine background soil characteristics. As long-term sampling locations for the purpose of daily moisture readings, HA02 and HA11 do not offer any significant value given their close proximity to HA01 and GSC02, which are represented by soil moisture Probe 1 that measures soil moisture continuously.</p>			

## Department of Water and Environmental Regulation

Section E – Details of non-compliance with licence condition	
Cause (or suspected cause) of non-compliance:	
The RIA can not identify any licence amendment application prompting the addition of these sampling points to the licence, which went undetected and therefore monitoring of these two locations was not implemented into the monitoring program.	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
The RIA does not consider that any adverse effects of non-compliance are present or likely. Accordingly, the RIA will propose an amendment to the licence to remove HA02 and HA11 to prevent recurrence of the non-compliance.	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes, and	
<input checked="" type="checkbox"/> Reported to DWER verbally	Date: 30/04/2025
<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>2</sup> :		Signature:	
Name: (printed)		Name: (printed)	
Position:	Executive Director	Position:	
Date:	26/9/2025	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.