



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Section A – Licence Details

Licence number:	L8871/2014/1	Licence file number:	DER2014/002858-1
Licence holder:	Suez Recycling and Recovery (Perth) Pty Ltd		
Trading as:	Suez (trading as Veolia from 22 March 2022)		
ACN:	118 828 872		
Registered address:	Level 3, 3 Rider Boulevard, RHODES, NSW, 2138		
Reporting period:	09/03/2021 to 08/03/2022		

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 at 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
Category 57	0 t
Category 61	11,146.9 t
Category 61A	579.3 t
Category 64	373,613.2 t
Category 67A	66,121.2 t

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
	Nil

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:	11	Date(s) of non-compliance:	13 October 2021
Details of non-compliance:			
Condition 11, untreated wood waste, point 5 - requires shredded wood waste to be removed from site within 28 days.			
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.			
Piles of shredded wood waste are a potential fire risk.			
Cause (or suspected cause) of non-compliance:			
NBRRP typically transports shredded untreated wood waste to a customer immediately upon shredding. Veolia's usual offtaker introduced higher quality standards (<20 mm in size material and metal content) before it would accept the untreated wood waste. Veolia was required to change its processing methods and was unable to source an alternative offtaker during the time it took to change its processing methods.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
NBRRP sourced a third-party screen and magnet to meet the customers new quality requirements. NBRRP are also refurbishing an older site screen to prevent a future occurrence and reliance on third party equipment. Additional fire mitigation strategies applied to stockpiles, such as regular temperature monitoring.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input checked="" type="checkbox"/> Reported to DWER verbally		Date: 13/10/2021	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 21/12/2021	

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:	5	Date(s) of non-compliance:	11 September 2021
Details of non-compliance:			
<p>Pond 3 was temporarily used to store leachate to prevent overtopping of ponds 1 and 2 following heavy rainfall. NBRRP had taken measures to make the pond watertight, but the Construction Quality Assurance (CQA) documentation, required under the construction conditions within L8871/2014/1 had not yet been completed.</p> <p>DWER was notified by email 31 July 2021 that leachate pond 3 may be required (prior to commissioning) if further high levels of rain eventuated. DWER formally responded on 05 August 2021 acknowledging that the emergency option presented a significantly lower risk than an uncontrolled overtopping event.</p> <p>On 11 September 2021, NBRRP were required to transfer leachate into Pond 3 to prevent leachate ponds 1 and 2 overtopping. DWER were notified.</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>			
There was no environmental impact.			
Cause (or suspected cause) of non-compliance:			
Unusually high rainfall had reduced the storage capacity for leachate in ponds 1 and 2. Commissioning activities on pond 3 had been delayed due to weather.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
All options were taken to avoid transferring leachate into pond 3 such managing levels within ponds 1 and 2 and offsite disposal of leachate. Pond 3 was emptied as soon as practicable. The CQA documentation has since been completed.			
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: 11/09/2021	

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:	13 October 2021
Details of non-compliance:			
Condition 13 requires putrescible waste to be covered with either 150mm of inert waste or a tarpaulin cover system as soon as practicable or not later than the end of the working day. NBRRP uses a tarpaulin cover system to cover the active tip area but was also using rejected mulch waste as day cover. The rejected mulch waste is not inert. Noted by DWER during a site inspection on 13 October 2021.			
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 rejected mulch waste is not inert and is a potential fire risk.			
Cause (or suspected cause) of non-compliance:			
Misinterpretation of the condition by the NBRRP team.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
NBRRP no longer uses rejected mulch waste as day cover.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input checked="" type="checkbox"/> Reported to DWER verbally		Date: 13/10/2021	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 21/12/2021	

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:		Position:	
Date:		27 May 2022	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.