

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:	L9240/2020/1	Licence file number:	DER2020/000039
Licence holder name:	Tellus Holdings Ltd.		
Trading as:	Tellus Holdings Ltd.		
ACN:	138 119 829		
Registered business address:	Level 6, Allendale Square, 77 St Georges Terrace PERTH WA 6000		
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"> • section C; • section D (if required); and • sign 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; 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
Category 61: Liquid Waste Facility Category 61A: Solid Waste Facility Category 65: Class IV secure landfill site Category 66: Class V intractable landfill site	Wastes Accepted: Controlled chemical waste: 62,637.57 t Unsealed Radioactive Waste: 875.41 t (plus a 1kL consignment yet-to-be-weighed) Sealed Radioactive Sources: 880 units Waste Disposed in Cell: Controlled waste: 67,892.34 tonnes Unsealed Radioactive Waste: 1150.66 tonnes Sealed Radioactive Sources: 12 units

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
	Supporting documentation included in the concurrently submitted L9240/2020/1 Annual Environment Report.

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
Category 85B – Sewage facility: treated wastewater from Wastewater Treatment Plant (WWTP) to the Irrigation Area	A total of 3,608 kL of treated wastewater from the WWTP was discharged to the designated irrigation area during the reporting period. Further details, including chemical analysis of wastewater are provided in the Licence Fee Application Supporting Documentation, submitted to DWER each April.

Section E – Details of non-compliance with licence condition (1 of 5)			
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:	7	Date(s) of non-compliance:	Ongoing
Details of non-compliance:			
<p>Condition 7 of the Licence requires that the maximum period that waste is permitted to be stored on site prior to permanent disposal is 12 months.</p> <p>As reported in previous years, some radioactive wastes and chemical liquid wastes received prior to the 30 June 2024 have been stored on site for a period of greater than 12 months.</p> <p>An inventory of 12-month exceedances was provided to DWER during the reporting period on 19/08/2024. An updated list of chemical and radiological wastes received during 2024-2025 with the potential to exceed the 12-month storage limit in 2025-2026, was provided to the Department on 30/06/2025.</p> <p>A further non-compliance of Condition 7 was identified, as 24 shipping containers of PFAS liquid waste were stored in the Main Yard rather than within the designated PFAS Storage Area specified in Table 3.</p>			
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.			
<p>This is considered an administrative non-compliance with no environmental impact due to the following:</p> <ul style="list-style-type: none"> • Liquid chemical wastes: stored in bunded areas and subject to daily inspections. Any leaks detected are promptly identified and remediated. • Radioactive materials: managed in accordance with the approved Radiation 			

Section E – Details of non-compliance with licence condition (1 of 5)	
<p>Management Plan. All radioactive wastes are packaged with at least two layers of containment (e.g. sealed drums inside sea containers) and stored in the bunded Radiation Yard. Compliance is confirmed through regular inspections by the Radiation Safety Officer and the Facility Manager.</p> <ul style="list-style-type: none"> • Storage of PFAS outside of PFAS bund: All PFAS liquid stored outside of the PFAS bund due to a lack of capacity were stored within the bunded Main Yard and subjected to daily inspections for leaks. 	
Cause (or suspected cause) of non-compliance:	
<ul style="list-style-type: none"> • Liquid chemical waste exceedance: The time required to design, manufacture, license, and commission new liquid processing infrastructure (Waste Neutralisation Plant and PFAS Homogenisation Tank) was underestimated. Further details specific to the processing of nitrosylsulphuric acid (NSA) were provided in the 12-month storage exemption request letter dated 24/07/2025. • Radioactive waste exceedance: In line with the Radiological Safety Case, certain wastes are optimally disposed of at the base of a cell. Disposal of some DSRS has therefore been deferred until the completion of Cell 2, rather than placing wastes in the upper lifts of Cell 1. Further detail was provided in the exemption request submitted 18/06/2025. • PFAS storage outside designated bund: The designated PFAS bund lacked sufficient capacity to accommodate all PFAS liquid waste volumes received onsite. A backlog of PFAS material awaiting processing through the WIP was compounded by a pause in PFAS concentrate processing following the discovery and reporting of PFAS limit exceedances in June 2023. The subsequent internal investigation determined the exceedances were caused by uneven mixing of PFAS solutions, leading to “spikes” in concentration. Installation of a homogenisation tank is underway to resolve this issue and enable processing of concentrated PFAS liquid to resume. 	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<ul style="list-style-type: none"> • Installation of additional liquid waste processing infrastructure, including the Waste Neutralisation Plant and PFAS Homogenisation Tank, is underway. Once commissioned, this will provide capacity to treat and dispose of the backlog of liquid chemical wastes, the vast majority of which are NSA and PFAS concentrate. • Construction of Cell 2 is scheduled for completion by September 2026. This will enable the permanent disposal of radioactive materials in accordance with the Radiological Safety Case. • Employment of additional waste processing technicians to process liquid waste • Tellus has continued to engage proactively with DWER on the management of 12-month exceedances and has provided detailed inventories of affected waste streams, including a forward projection of potential exceedances expected during the 2025-26 reporting period. Scoping discussions regarding several licence amendments to facilitate compliance are planned for 2025. 	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes, and	
<input type="checkbox"/> Reported to DWER verbally	Date:

Section E – Details of non-compliance with licence condition (1 of 5)	
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 29/08/2024, 30/06/2025

Section E – Details of non-compliance with licence condition (2 of 5)			
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(b)	Date(s) of non-compliance:	Ongoing
Details of non-compliance:			
<p>Condition 16(b) requires the licence holder to prepare and document waste stabilisation and solidification process(es) and associated QA/QC procedures for each liquid waste stream. While several procedures were in place (e.g. Chemical Treatment of Liquid Waste, WIP Operation Procedure, WIP Formulation & QAQC, Chemical Treatment of Pesticide Waste, Non-reactive Liquid Solidification), the annual review identified that not all liquid waste stabilisation and solidification processes were documented in accordance with Condition 16(b).</p> <p>Specifically:</p> <ul style="list-style-type: none"> • QA/QC testing requirements were not adequately documented for all liquid waste streams treated using portable mixing equipment. • The WIP QA/QC procedure (SR-09-PRO-015) reflected superseded requirements and only covered PFAS waste streams. • Adequate documented procedures and QA/QC requirements were not available for some liquid wastes processed during the reporting period (e.g. nickel liquid, lead nitrate sludge, ammonia washings, PCB oil). • No documented procedure for the mixing of different types of liquid wastes. • Inadequate testing frequencies were noted for 8 WIP batches >100 m³, where more than one sample is required in accordance with the <i>Landfill Waste Classification and Waste Definitions 1996 (as amended 2019)</i>. 			
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.			
This is considered an administrative non-compliance. No adverse environmental impact is believed to have occurred.			
Cause (or suspected cause) of non-compliance:			
Tellus considered that existing liquid waste procedures, together with waste stream-specific formulations developed by an industrial chemist and documented in laboratory records were sufficient to demonstrate compliance. However, Tellus accepts that this approach did not fully meet the requirement for documented stabilisation/solidification processes and QA/QC procedures for each liquid waste stream.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			

Section E – Details of non-compliance with licence condition (2 of 5)	
<p>Tellus is developing comprehensive documentation to fully comply with Condition 16(b). Completion of these documents is expected in Q3 2025, with further updates to be made as new waste streams are received. The updated procedures will be reviewed by an independent consultant prior to implementation to verify compliance with licence conditions.</p>	
<p>Was this non-compliance previously reported to DWER?</p>	
<p><input checked="" type="checkbox"/> Yes, and</p>	
<p><input type="checkbox"/> Reported to DWER verbally</p>	<p>Date:</p>
<p><input checked="" type="checkbox"/> Reported to DWER in writing</p>	<p>Date: 29/08/2024</p>

Section E – Details of non-compliance with licence condition (3 of 5)			
<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:	17	Date(s) of non-compliance:	17/11/24, 14/01/25, 21/01/25, 18/02/25, 27/03/25, 25/05/25, 01/06/25, 28/06/25
Details of non-compliance:			
<p>Condition 17 requires the licence holder to undertake post-stabilisation and solidification verification sampling and analysis for each batch of liquid waste processed through the WIP or portable mixing equipment, in accordance with the sampling frequencies specified in the <i>Landfill Waste Classification and Waste Definitions</i> guidelines.</p> <p>DWER raised a non-compliance due to verification sampling not being undertaken at the correct frequency for several WIP batches. Every WIP batch was sampled at least once, and all results met the relevant acceptance criteria: free water tests, Clegg impact values, and PFAS analysis (where required). However, while one sample is sufficient for homogeneous batches under 100 m³ (Figure 2 of the guidelines), larger batches exceeding 100 m³ require four to six verification samples (Figure 3 of the guidelines).</p> <p>During the 2024–25 reporting period, 47 batches were processed through the WIP. Based on tonnage and density, Tellus acknowledges that up to eight of these batches may have exceeded 100 m³ and therefore should have been subject to four to six QA/QC samples, rather than a single sample. Further details are presented in the L9240/2020/1 Annual Environment Report.</p> <p>In addition, 28 batches were processed using portable mixing equipment, all of which were under 100 m³. These therefore required only one verification sample each. All 28 portable mixing batches met the relevant QA/QC criteria.</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>			

Section E – Details of non-compliance with licence condition (3 of 5)	
Although sampling was not done at the required frequency for up to eight of the 75 liquid waste batches processed, all batches were subject to QA/QC testing of at least one sample and complied with the specifications in Table 4. On this basis, the non-compliance is considered administrative in nature, and no environmental impact is believed to have occurred.	
Cause (or suspected cause) of non-compliance:	
This non-compliance may be a result of inadequate QA/QC documentation for each liquid waste stream as described in Condition 16 above.	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
Please refer to actions listed under Condition 16 above.	
Was this non-compliance previously reported to DWER?	
<input type="checkbox"/> Yes, and (This was raised as a non-compliance by DWER on 12/06/2025)	
<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 (4 of 5)			
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:	19	Date(s) of non-compliance:	ongoing
Details of non-compliance:			
<p>Condition 19 requires the licence holder to manage in-ground waste disposal activities in accordance with a range of operational requirements, including the requirement at 19(b) that <i>“where stabilised and solidified liquid wastes are disposed, these wastes have been subject to the requirements of Condition 16.”</i></p> <p>During the reporting period, Conditions 19(a), (c), (d), (e), (f), (g) and (h) were met. However, as described under the Condition 16 non-compliance, QA/QC procedures had not been fully established for each liquid waste stream. Therefore, sub-condition 19(b) is considered non-compliant.</p>			
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.			
This is considered an administrative/documentation non-compliance. All wastes disposed of in the cell were stabilised and solidified in accordance with established processes, and verification testing confirmed compliance with licence specifications. No adverse environmental impact is believed to have occurred.			
Cause (or suspected cause) of non-compliance:			

Section E – Details of non-compliance with licence condition (4 of 5)	
<p>As outlined under Condition 16, the non-compliance was due to misinterpretation of requirements that lead to inadequate liquid waste processing and QA/QC documentation.</p> <p>Tellus considered that compliance was being achieved through general liquid waste procedures and chemist-developed formulations for each waste stream. Tellus accepts this did not fully satisfy the requirements of Condition 16(b), and therefore 19(b).</p>	
<p>Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:</p>	
<p>Tellus is in the process of developing comprehensive documentation to fully comply with Condition 16(b). Completion of these documents is expected in Q3 2025, with further updates to be made as new waste streams are received.</p> <p>The updated procedures will be reviewed by an independent consultant prior to implementation, and Tellus will provide DWER with progress updates.</p>	
<p>Was this non-compliance previously reported to DWER?</p>	
<p><input type="checkbox"/> Yes, and (This was raised as a non-compliance by DWER on 12/06/2025)</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 E – Details of non-compliance with licence condition (5 of 5)			
<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:	29	Date(s) of non-compliance:	Ongoing
<p>Details of non-compliance:</p>			
<p>Condition 29 requires the licence holder to maintain accurate and auditable books, including records and data listed under sub-conditions (a) to (n). Tellus was compliant with all sub-conditions (a)–(n), except for 29(j). Condition 29(j) requires the maintenance of procedures and documentation relating to liquid waste stabilisation and solidification treatment methods, including verification testing results and copies of laboratory analysis. During the reporting period Liquid waste standalone QA/QC procedures were not available for each waste stream (as previously reported under Condition 16b above).</p>			
<p>What was the actual (or suspected) environmental impact of the non-compliance?</p> <p>NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
<p>This is considered an administrative/documentation non-compliance with no believed environmental impact. All liquid wastes treated during the reporting period were tested for free water, subjected to Clegg testing, and analysed for PFAS in accordance with licence specifications, with all results within required limits.</p>			
<p>Cause (or suspected cause) of non-compliance:</p>			

Section E – Details of non-compliance with licence condition (5 of 5)	
<p>As outlined under Condition 16, the non-compliance was due to misinterpretation of documentation requirements. Tellus considered that compliance was being achieved through general liquid waste procedures and chemist-developed formulations for each waste stream; however, this did not fully satisfy the requirements of Condition 16(b), and therefore 29(j).</p>	
<p>Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:</p>	
<p>Tellus is in the process of developing comprehensive documentation to fully comply with Condition 29(j). Completion of these documents is expected in Q3 2025, with further updates to be made as new waste streams are received.</p> <p>The updated procedures will be reviewed by an independent consultant prior to implementation, and Tellus will provide DWER with progress updates.</p> <p>In addition, Tellus is in the process of updating its data management system so that numerous spreadsheets are superseded by an integrated database. This work is being rolled out in phases and will continue into 2026.</p>	
<p>Was this non-compliance previously reported to DWER?</p>	
<p><input type="checkbox"/> Yes, and (This was raised as a non-compliance under 16(b) by DWER on 12/06/2025)</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 particular¹.</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>			
Date:	28/08/2025	Date:	28/08/2025
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.