



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Section A – Licence Details			
Licence number:	L9426/2024/1	Licence file number:	DER2024/000051
Licence holder:	Perdaman Chemicals and Fertilisers Pty Ltd		
Trading as:	Perdaman Chemicals and Fertilisers Pty Ltd		
ACN:	121 263 741		
Registered address:	Alluvion Building Level 17 58 Mounts Bay Road PERTH WA 6000		
Reporting period:	19 /03 / 2024 to 30 / 06 / 2024		

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; andsign 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; andsign 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 12	849,992 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
N/A	N/A

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:	Non-compliant with Licence commencement date/ annual period	Date(s) of non-compliance:	15/03/2024 to 18/03/2024
Details of non-compliance:			
<p>The sub-contractor commenced Crushing and Screening activities on the 15/03/2024, when the draft Licence was issued and according to the site schedule of indicative activities. The Licence was issued (granted) on the 19/03/2024. The activities under the Licence commenced 3 days prior to the Licence being issued.</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>			
No actual or suspected environmental impact was associated with the non-compliance.			
Cause (or suspected cause) of non-compliance:			
<p>Site schedule indicated time of commencement to be 15/03/2024 in order to adhere to Project program deliverables. Site personnel were made aware that the draft Licence was issued and took this as the indication to start crushing and screening activities. Sub-contractor followed the indicative schedule, rather than confirming the Licence commencement/ issue date.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>There has been no adverse effects of the non-compliance. The Annual throughput was within the allowable limit of 850,000 tonnes at an average daily throughput of 5,000T. To prevent reoccurrence, the Contractor and sub-contractor have been educated on the Licence conditions, commencement dates and annual reporting periods. A non-compliance letter was sent to the contractor on 21 March 2024, regarding the above. Sub-contractor to ensure relevant works approval or Licence is granted before works commence.</p>			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> No <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:	Condition 10 / Table 4.	Date(s) of non-compliance:	Between dates of 19/03/2024 to 07/05/2024
Details of non-compliance:			
Between the dates of 19 March 2024 to the hours of 2255 on 7 May 2024, the weather station was averaging within 5-minute intervals instead of 10-minute intervals as detailed in Condition 10 / Table 4.			
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.			
No actual or suspected environmental impact of the Non-Compliance.			
Cause (or suspected cause) of non-compliance:			
Vendor/Supplier (ETS) did not set up the weather station to be as per client (Perdaman's) Licence requirements (wind speed and direction to be within 10-minute averages).			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
After numerous requests to the vendor/supplier, on 07 May 2024 at 2300 hours, the vendor/supplier changed the averaging period to 10-minute intervals, from 5-minute intervals. No further action required.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> No, <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

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Condition no:	Condition 14 (a) Condition 14 (b)	Date(s) of non-compliance:	Multiple dates including: 19/03/2024 24/03/2024 24/03/2024 03/04/2024 02/06/2024
Details of non-compliance:			
Sub-contractor crushing and screening production docketts (multiple within reporting period) being used onsite by the Sub-Contractor were being "whited out" when mistakes were made on the records. Therefore, amending them in such a way that any subsequent amendments remain legible and are capable of retrieval was not complied with.			
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.			
No actual or suspected environmental impact of the Non-Compliance.			
Cause (or suspected cause) of non-compliance:			
Sub-contractor onsite not being aware of the requirement to maintain records in a legible manner where original versions are retrievable.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Email was sent to the Sub-contractor by the Environmental Manager regarding this non-compliance issue on 2/06/2024. Sub-contractor was educated on the correct method of keeping records legible and amendable, when errors or mistakes are made on records.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> No, <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:	Condition 7, Table 3 Monitoring equipment	Date(s) of non-compliance:	Multiple dates within the reporting period – see AER for further details
Details of non-compliance:			
<p>During the reporting period technical difficulties were encountered with the monitoring equipment, hindering the ability to collect data consistently. Issues with monitoring noted as follows:</p> <ul style="list-style-type: none"> • Monitor 3 had no monitoring data available for period 25/3/2024 to 21/4/2024. • Receptor monitor (portable dust monitor) was only installed onsite on 22 April 2024, due to equipment supplier delays. • Monitors 1-4 have not been updated to monitor in 10-minute averages, with them all still reading every 15-minutes as per the manufacturer's specifications. • Receptor monitor is the only monitor that is monitoring in 10-minute averages, since 7 May 2024. 			
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> <p>No actual or suspected environmental impact of the Non-Compliance.</p>			
Cause (or suspected cause) of non-compliance:			
<p>Various reasons for technical difficulties experienced, including electrical failures (power surges or electrical/power issues), design failures, environmental factors including, but not limited to, moisture following a rain event, accumulation of dust, dirt and other contaminants interfering with sensors and electrical components and possibly component defects. The vendor, ETS, has not provided support to change the 15-minute averaging monitoring time period to the required 10-minute averages.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Education, training and (limited) support for the onsite environmental team by the vendor, problem-solving discussions with greater environmental team, regular inspections and maintenance of the monitoring equipment and upgrading and replacing monitors to portable dust monitors (within Licence specifications).</p>			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> No, <input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	

Commented [DC1]: What about the effect of water/ moisture in the air? Non-compliance with trigger values noted that the monitor(s) gave inaccurate readings following rain



Section E – Details of Non-Compliance with Licence Condition

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Condition no:	Condition 7, Table 3 Exceedances	Date(s) of non-compliance:	Multiple dates within the reporting period – see AER for further details
Details of non-compliance:			
51 exceedances of the management triggers were reported during the period. Refer to Tables 1, 2 and 3 of the Annual Environmental Report, for further details.			
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.			
No actual or suspected environmental impact of the Non-Compliance, as all management trigger criteria exceedances were investigated as specified in Condition 8, and it was determined that the exceedances were not caused by the crushing and screening activities.			
Cause (or suspected cause) of non-compliance:			
There were a number of reasons why exceedances were triggered, however as noted above, it was determined that the exceedances were not attributed to the crushing and screening activities, and in many cases not related to any other construction activities on site. Refer to Tables 1, 2 and 3 of the Annual Environmental Report, for further details.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
No further actions required. A trigger investigation was undertaken on site following each exceedance and confirmed that these were not attributed to crushing and screening activities.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> No, <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 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 :	[Redacted]	Signature:	[Redacted]
Name: (printed)	[Redacted]	Name: (printed)	[Redacted]
Position:	Chairman	Position:	Director
Date:	29.07.2024	Date:	29.07.2024
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.