

Date: 18 December 2015

COMMENTS PAPER – Department of Environment Regulation DRAFT *Publication of Annual Audit Compliance Reports*

Background

Department of Environment Regulation (DER) has released for consultation [Draft Guidance Statement: Publication of Annual Audit Compliance Reports](#). The Water Corporation welcomes the opportunity to comment. Submissions are due by 24 December 2015.

The Water Corporation operates 116 wastewater treatment plants and two seawater desalination plants as prescribed premises (listed in Schedule 1 of the *Environmental Protection Regulations 1987*) across Western Australia under Part V of the *Environmental Protection Act 1986* (EP Act); in accordance with DER issued environmental registrations and licences. Licences are issued with conditions that require the submission of Annual Audit Compliance Reports (AACR).

Comments

Guidance Statement: Inclusion of AACR as part of Annual Environmental Reporting

Inclusion of AACRs as part of Annual Reporting is positive. It was however apparent in the recently reviewed *draft Licence Template* (for which consultation closed 13 November 2015) that timing for AACR submission would be based on licence anniversary dates. This is contrary to current Water Corporation reporting requirements (i.e. the majority of Water Corporation licences require AACRs and AERs to be submitted by or around 1 September each year). Should the submission of AERs also be aligned with licence anniversary dates in the future, it is suggested that the period for submission of annual reports, including AACRs, is reasonable and adequately addresses resource requirements to report effectively and in a timely manner.

AACR Template: Section B — Statement of compliance with licence conditions

It is suggested that this section questions the licensee with regard to compliance with *all* conditions; e.g. “Did you comply with *all* your licence conditions during the reporting period?” This would accordingly mean that an answer of “no” would not imply non-compliance with all licence conditions.

AACR Template: Section C — Declaration

The publishing of AACRs is largely welcomed. Section C however does not address the licensee’s consideration with regard to the confidentiality of the information being provided and whether or not the relevant information should be published. It is suggested that Section C be revised to include wording that takes into account confidentiality of the information being provided.

Contact Details

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