



## 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:	L7303/1998/10	Licence file number:	DEC8923/1-3
Licence holder name:	Western Metropolitan Regional Council		
Trading as:	WMRC		
ACN:	N/A		
Registered business address:	Unit 2/317 Churchill Avenue, SUBIACO WA 6008 Premises: West Metro Recycling Centre, 60 Lemnos Street, SHENTON PARK WA 6010		
Reporting period:	01 / 10 / 2023 to 30 / 09 / 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"><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
Cat 62 – Solid Waste Depot	Total recorded production quantity = 73,515 tonnes (in & out) Total recorded inbound = 39,050 tonnes Total recorded outbound = 35,374 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:	4(b)	Date(s) of non-compliance:	26/11/2024
Details of non-compliance:			
<p>Table 1 – Hazardous Waste – provides a combined limit of 100 tonnes per year for the specified hazardous waste. Site records these items as “HHW” for general hazardous waste; “Paint”; and “Batteries” for used lead acid batteries.</p> <p>The following quantities were recorded for each of those items during the AACR reporting period:</p> <ul style="list-style-type: none"> <li>• HHW – 43.02 tonnes (vs 24.26t in the prior year)</li> <li>• Paint – 54.12 tonnes (vs 51.76t in the prior year)</li> <li>• Batteries – 26.36 tonnes (vs 22.26t in the prior year)</li> </ul> <p>The total combined volume of Hazardous Waste recorded in the AACR report period is 123.5 tonnes, exceeding the 100 tonne prescribed limit</p>			
<p>What was the actual (or suspected) environmental impact of the non-compliance?</p> <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>The non-compliance is a simple exceedance of the prescribed limit, and no environmental impacts are noted or suspected as a result of the breach.</p> <p>The materials have continued to be managed in a suitable and appropriate manner in accordance with industry practice.</p>			
Cause (or suspected cause) of non-compliance:			
<p>The cause is two-fold:-</p> <ul style="list-style-type: none"> <li>• The prescribed limit is too low for the quantity of materials being received</li> <li>• A review of practices found that battery tonnage had not been included in total quantities.</li> </ul>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>There are no identified adverse effects as a result of the non-compliance.</p> <p>The amounts received reflect the increased participation in responsible disposal of hazardous waste and the needs of the community within the catchment of the centre. Consequently, the following actions are proposed or in process of being implemented:</p> <ul style="list-style-type: none"> <li>• WMRC commits to a licence review with the intent of seeking a licence amendment to increase the combined limit for Hazardous Waste to a more appropriate value.</li> <li>• WMRC will improve monitoring of material quantities received; including on YTD and rolling 12-month basis</li> </ul>			

Section E – Details of non-compliance with licence condition	
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: 27 / 11 / 2024

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:	19	Date(s) of non-compliance:	26/11/2024
Details of non-compliance:			
<p>Licence Condition 19 requires the asbestos bin to be secured and covered with an appropriate tarp.</p> <p>The tarp has been missing for an unknown period of time, and has not been identified during site inspections.</p> <p><b>The asbestos bin has not been covered with an appropriate tarp.</b></p>			
<p>What was the actual (or suspected) environmental impact of the non-compliance?</p> <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 are no known or suspected environmental impacts as a result of not having a tarp covering the asbestos bin.</p>			
Cause (or suspected cause) of non-compliance:			
Oversight			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>There are no identified adverse effects as a result of the non-compliance.</p> <p>A tarp has been immediately sourced and replaced as required.</p> <p>An item will be added to the next staff toolbox to remind all staff of the requirement.</p>			
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: 27 / 11 / 2024	

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:	22	Date(s) of non-compliance:	Ongoing
Details of non-compliance:			
<p>Table 2 – FOGO – provides approved processes for the handling and storage of FOGO. The facility manages FOGO as per the noted 'System 2' (System 1 is utilised for putrescible waste, specifically kerbside residual waste).</p> <p>The specification requires:</p> <ul style="list-style-type: none"> <li>• Loads to be unloaded to Bay 5</li> <li>• Transferred to the hopper at Bay 6 within 30 minutes of delivery</li> </ul> <p>In practice, the facility receives deliveries of FOGO into a waste bunker at bays 7,8 and 9; contrary to the requirement to unload FOGO into Bay 5.</p> <p>For the majority of the reporting period, the FOGO Processing Contractor conducted preliminary removal of contamination from the delivered FOGO prior to the material being loaded into the hopper at Bay 6. This activity was a simple 'litter pick'. The activity ceased on 4 October with the inclusion of an appropriate picking line at the processor's facility.</p> <p>The time taken to transfer the FOGO material from the waste bunker into the hopper (which feeds a stationary compactor and blade ejector trailer system) can often exceed 30 minutes. The time factors can be impacted by:</p> <ul style="list-style-type: none"> <li>• Prioritising deliveries from collection vehicles – they require efficient service at the delivery point.</li> <li>• Availability of ejector trailers – occasionally the site will need to wait for an empty trailer to be returned to continue loading operations.</li> <li>• When the preliminary picking operation was being conducted, the time on floor was extended to enable the preliminary picking of contamination from the FOGO.</li> </ul> <p>The non-compliance is:</p> <ul style="list-style-type: none"> <li>• Deliveries of FOGO are not unloaded into Bay 5</li> <li>• Transfer of the FOGO material to the hopper at Bay 6 often takes longer than 30 minutes from delivery</li> </ul>			
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 are no known or suspected environmental impacts as a result of not handling FOGO in the approved manner.</p> <p>It is noted that transfer of the material into the hopper is now vastly improved with the cessation of the litter picking; however, the time taken to transfer still often exceeds 30 minutes.</p>			



Section E – Details of non-compliance with licence condition	
Cause (or suspected cause) of non-compliance:	
The nature of how the operation evolved in practice; including insistence from the processor that preliminary picking was required whilst they completed installation of their own picking station.	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<p>There are no identified adverse effects as a result of the non-compliance.</p> <p>The manner in which the activity has evolved, and how the material is currently being handled is following contemporary practice and is appropriate for this type of waste management facility. WMRC commits to a licence review with the intent of seeking a licence amendment to update the specification in table 2 for handling and storage of FOGO in line with the adopted practice.</p>	
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: 27 / 11 / 2024

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:	22	Date(s) of non-compliance:	Ongoing
Details of non-compliance:			
<p>Table 2 – Putrescible Waste, including MSW – provides that (unless stored in sealed silos) all other waste of this type must not remain on the premises for more than 24 hours from time of receipt.</p> <p>Specifically in relation to bulk (hard) waste (not putrescible by nature but deemed to be provided for within this section). The facility is open seven days per week, however contracted haulage services are only provided during weekdays. Material which is received during the last half of each Friday, and through the weekend will not be removed within the prescribed timeframes.</p> <p><b>Deemed putrescible waste / MSW, specifically bulk / hard waste, remains on the premises for longer than 24 hours from time of receipt, contrary to the prescribed time limit.</b></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 are no known or suspected environmental impacts as a result of exceeding prescribed timeframes.			
Cause (or suspected cause) of non-compliance:			
The nature of how the operation evolved in practice.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>There are no identified adverse effects as a result of the non-compliance.</p> <p>The manner in which the activity has evolved, and how the material is currently being handled is appropriate for this type of waste management facility.</p> <p>WMRC commits to a licence review with the intent of seeking a licence amendment to update the specification in table 2 for handling and storage of Putrescible Waste in line with the adopted practice for handling of bulk / hard waste.</p>			
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: 27 / 11 / 2024	

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:	22	Date(s) of non-compliance:	Ongoing
Details of non-compliance:			
<p>Table 2 – E-waste – requires that e-waste must be accepted and stored within the requirements of AS/NZS 5377:2013.</p> <p>The facility does not meet the following requirements of the standard as it pertains to collection and storage facilities:</p> <p>2.4.2(b) – [shall have] weatherproof coverings</p> <p><b>The receipt and storage area for e-waste is an open-air environment, and covers for the e-waste are not provided.</b></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 are no known or suspected environmental impacts as a result of not providing weatherproof coverage for the e-waste.</p>			
Cause (or suspected cause) of non-compliance:			
Due to the nature of the facility, protection from the elements was not considered to be an issue, and seems to have not been previously identified as a non-compliance.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>There are no identified adverse effects as a result of the non-compliance.</p> <p>WMRC will review options to provide weatherproof coverings for the e-waste, and implement an appropriate solution.</p>			
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: 27 / 11 / 2024	



## 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:		Position:	
Date:	29 November 2024	Date:	29 November 2024
Seal (if signing under seal):	N/A		

<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.