



## 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:	L8344/2009/2	Licence file number:	DER2016/001679
Licence holder name:	Primary Partners Pty Ltd		
Trading as:	Roebuck Export Depot		
ACN:	108 266 548		
Registered business address:	Level 7, 70 Franklin St, Adelaide, SA, 5001		
Reporting period:	01/01/2023 to 31/12/2023		

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
55 – More than 50,000 animals per annum	40,516

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:	1.2.6	Date(s) of non-compliance:	March 2023, June 2023, September 2023
Details of non-compliance:			
Manure was not collected at three monthly intervals during the year as per condition 1.2.6 but was removed from the pens in December 2023.			
What was the actual (or suspected) environmental impact of the non-compliance?			
<b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
The actual environmental impact of this non-compliance is considered to be negligible, if any. While the manure remained in the yards, the potential for it to contaminate groundwater or surface water outside of the premises is minimal. The yards are operated predominantly in the dry season months when rainfall is low, giving little opportunity for rainfall runoff to occur. Additionally, in the event of rainfall while there is manure in the yards, the bases are constructed with compacted pindan soil and the extensive drainage system directs rainfall runoff into the stormwater retention pond.			
Cause (or suspected cause) of non-compliance:			
Limited availability of contractors throughout the year to carry out yard cleaning, due to prioritized roadworks (following flood damage) taking up machinery availability throughout the year. Additionally, it is logistically difficult to remove manure when the pens are full of cattle during the operating season.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Discussions around amending the license for this condition commenced in mid-2022, with Primary Partners Pty Ltd (PPPL) applying for an amendment of this condition in our license on the 9 <sup>th</sup> of September 2022. Conversations have been ongoing since this time and PPPL received draft conditions of a new license on 26 <sup>th</sup> October 2023. Under the new conditions, PPPL plans to compost the manure onsite, with any raw manure awaiting treatment to be stockpiled on a designated hardstand. Additionally, a skid steer loader has been purchased which will allow the pens to be regularly cleaned throughout the season without relying on external contractors.			
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: 28/06/2022, 23/02/2023	

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:	1.2.7	Date(s) of non-compliance:	December 2023
Details of non-compliance:			
Collected manure was not disposed of offsite and will be stockpiled for more than 14 days.			
What was the actual (or suspected) environmental impact of the non-compliance?			
<b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
The actual environmental impact of this non-compliance is considered to be negligible, if any. The manure was removed from the pens at the end of the operating season and placed on a hardstand awaiting further treatment. This hardstand is located within the prescribed drainage area, meaning any rainfall runoff will be captured by the stormwater retention pond. The hardstand is constructed with packed pindan soil. There are no watercourses close to RED and the complex is a substantial distance (16km's) from Roebuck Bay.			
Cause (or suspected cause) of non-compliance:			
On the 13 <sup>th</sup> of February 2023, PPPL was advised in a letter from DWER that collected manure can only be disposed of at a premises that is lawfully able to accept manure for further processing or disposal, such as a licensed composting facility or a solid waste facility. If sent to a farm, then this land must be licensed for that purpose (if more than 1,000 tonnes per year). PPPL was not able to find an appropriately licensed farm, composting facility or a solid waste facility which to dispose the manure.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Following conversations with DWER into best options to prevent recurrence of non-compliance, PPPL has commenced planning to build a composting facility onsite, in order to process the manure into a product which can be taken offsite without license. The details of this can be found in the draft license conditions, provided by DWER on 26 <sup>th</sup> October 2023.			
Was this non-compliance previously reported to DWER?			
<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:	1.2.8	Date(s) of non-compliance:	15 December 2023
Details of non-compliance:			
Accumulated manure was not removed from the site by the 15 <sup>th</sup> of December 2023.			
What was the actual (or suspected) environmental impact of the non-compliance?			
<b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
The actual environmental impact of this non-compliance is considered to be negligible, if any. The manure was removed from the pens at the end of the operating season and placed on a hardstand awaiting further treatment. This hardstand is located within the prescribed drainage area, meaning any rainfall runoff will be captured by the stormwater retention pond. The hardstand is constructed with packed pindan soil. There are no watercourses close to RED and the complex is a substantial distance (16km's) from Roebuck Bay.			
Cause (or suspected cause) of non-compliance:			
On the 13 <sup>th</sup> of February 2023, PPPL was advised in a letter from DWER that collected manure can only be disposed of at a premises that is lawfully able to accept manure for further processing or disposal, such as a licensed composting facility or a solid waste facility. If sent to a farm, then this land must be licensed for that purpose (if more than 1,000 tonnes per year). PPPL was not able to find an appropriately licensed farm, composting facility or a solid waste facility which to dispose the manure.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Following conversations with DWER into best options to prevent recurrence of non-compliance, PPPL has commenced planning to build a composting facility onsite, in order to process the manure into a product which can be taken offsite without license. The details of this can be found in the draft license conditions, provided by DWER on 26 <sup>th</sup> October 2023.			
Was this non-compliance previously reported to DWER?			
<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:	1.2.10	Date(s) of non-compliance:	15 December 2023
Details of non-compliance:			
Liquid chemical was not removed from the dip pit by the 15 <sup>th</sup> of December.			
What was the actual (or suspected) environmental impact of the non-compliance?			
<b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
The actual environmental impact of this non-compliance is considered to be negligible, if any. The dip pit is contained within a concrete tank and the level is monitored to ensure no overflowing of the chemicals occurs.			
Cause (or suspected cause) of non-compliance:			
Due to the late onset of the wet season at the end of 2023, cattle were still moving through the yards in late December and early January 2024. Therefore, the dip could not be emptied due to it being needed for dipping of the cattle.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
An empty 1000 litre IBC tank is kept onsite to pump dip chemicals into, in the event the dip pit fills with rainfall and is at risk of overflow. There is also a corrugated iron roof over the dip pit to prevent rainfall from entering the pit.			
Was this non-compliance previously reported to DWER?			
<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 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:	Chief Executive Officer	Position:	
Date:	25/01/2024	Date:	
Seal (if signing under seal):			

<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.