



L8796/2013/1

Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Section A – Licence Details

Licence number:	L8796/2013/1	Licence file number:	
Licence holder:	Bendotti Exporters Pty Ltd		
Trading as:	WA Chip		
ACN:	099 895 904		
Registered address:	Lot 689 on Plan 175853 Franklin Street Manjimup WA 6258		
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)

☐ Yes – please complete:

- section C;
- section D if required; and
- sign the declaration in Section F.

☒ No – please complete:

- section C;
- section D if required;
- section E; and
- sign 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
18 Food Processing	12,646 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
18 Food Processing	106,279m3

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:	Schedule 1 Approved Premises Production Capacity	Date(s) of non-compliance:	July, Aug, Sept, Oct Nov, Dec 2023
Details of non-compliance:			
First Exceeded Tonnage license limit of 8000T during the month of July 2023. Monthly exceedances July 331T, Aug 1445T, Sept 265T, Oct 831T, Nov 1023T, Dec 751T. Total exceedance = 4646T			
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.			
The <i>suspected</i> environmental impact is an increase in emissions at L1 of Phosphorus, Nitrogen, BOD and TDS as well as total dissolved solids.			
Cause (or suspected cause) of non-compliance:			
Failure by the licence holder to evaluate successful functioning of waste system and also successfully apply for an increase in licence limit before 2023.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Waste-Water system upgrade/replacement in planning assessing stages and being monitored by DWER staff. Engagement of contract Environmental Engineer Kate McCormick to provide professional advice and guidance to bringing to fruition remediation of environmental failures and risks.			
Was this non-compliance previously reported to DWER? 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:	8 (Table 4) Target Exceedances	Date(s) of non-compliance:	2023
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Details of non-compliance:

L1 emissions exceeded Revised Licence by the following value in the indicated month.

L8796/2013/1 - BENDOTTI EXPORTERS PTY LTD**Emissions Item 8 – L1 Over Target Emissions for 2023**

	TN	Total Phos - Ortho	pH	TDS	Oil & Grease	BOD
	mg/L	mg/L	pH units	mg/L	mg/l	mg/l
Trigger Value	10.0	2.0	8.5	1,000.0	5.0	40.0
Jan 2023	-10.2	-9.3	0.0	-440.0		-3.5
Feb 2023	-21.0	-21.4	0.0	-530.0		
Mar 2023	0.0	-19.4	0.2	-600.0		-3.0
Apr 2023	-25.2	-10.2	0.0	-100.0	-13.0	
May 2023	-29.0	-21.2	0.0		-62.0	
Jun 2023	-32.2	-12.1	0.0	-80.0	-15.0	-16.2
Jul 2023	-0.7	-3.9	0.0		-7.0	-26.8
Aug 2023	-9.9	-4.5	0.0	-70.0	-2.0	-27.3
Sep 2023	-11.7	-2.3	0.0		-8.0	
Oct 2023	-18.3	-16.0	2.7		-20.0	-5.0
Nov 2023	-17.0	-15.8	0.1		-128.0	-56.0
Dec 2023	-3.3	-19.3	0.0	-460.0	-570.0	-47.0

Quantity target exceed by

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.

Emissions between sample location L1 and WQ1 (Smith Brook Dam) received elevated concentrations of Phosphorus and Nitrogen Nutrients. BOD & TDS loading. The Dec Oil & Grease reading is expected to be a contamination as the 31 Jan 2024 reading was 16mg/L. WQ1 did not overflow during 2023 due to insufficient inflows.

Cause (or suspected cause) of non-compliance:

-Parts of the waste-water treatment plant under performing compared to expectation. The whole system is under review by a contract Environmental Engineer. Sampling and assessing of various components of the waste system has commenced and been repeated to identify problem components within the system.

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:

Completely new waste-water treatment plant quoted at \$2.8Million was received Dec 2024. Environmental Engineer engaged who is determining the functional efficiency of individual existing components. Purchase of ~\$24,000 new aeration nozzles, pumps and air manifold in Dec 2023 shipping from USA early 2024. To be installed as soon as practical after receipt onsite.	
Was this non-compliance previously reported to DWER? 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:	Works Item 4	Date(s) of non-compliance:	31 Dec 2023
Details of non-compliance:			
Installation of New Monitoring Wells MW1 and MW2 were sunk on 4 th Jan 2024 therefore no quarterly readings were possible in the 2023 year.			
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>It is suspected there is minimal environmental impact from the wells not being available to sample in the Dec 2023 quarter. The only calculable is loss the statistical loss of one data set whereby to monitor decret and emerging trends.</p>			
Cause (or suspected cause) of non-compliance:			
No driller was available or able within the window, constrained by both the weather and commercial operators in this field.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Pretesting of proposed locations was undertaken to ensure the ground water level would remain below the installed monitoring well.			
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: 5 / 2 / 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:	12 Table 6	Date(s) of non-compliance:	2023 See below
Details of non-compliance:			
<p>Weekly L1 discharge meter readings missed. 6to28April=22days, 4to23May=19days, 11to25July=14days, 7to25Aug=18days, 1toDec27Dec=27days. These readings were missed by misunderstanding between operators. 8th Sept to 10 Oct the factory was not processing due to maintenance. In this period 8to21Sept=13days a single reading was missed as there was only a skeleton maintenance staff onsite. 10to20Oct=10days restarting production a reading was missed as we undertook processing water composite sampling for waste system design by Tristar Water.</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> <p>Low likelihood of any significant environmental impact as normal analyte sampling continued and meter volumes are cumulative. We only lost the weeks end points defining the discreet volume discharged. The total L1 volume was still captured by the surrounding and annual start and finish readings.</p>			
Cause (or suspected cause) of non-compliance:			
<p>As above, the greatest number of failures was operator error and then the lack of available staff during major factory maintenance.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Surround readings were compared ensuring flow averages were statistically similar to surrounding weeks.</p>			
Was this non-compliance previously reported to DWER? 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:	Records and reporting Item 21	Date(s) of non-compliance:	1 March 2023
Details of non-compliance:			
Extension of lodgment date for 2023 AER sought by The Licence holder and it's contract NATA lab and report compiler West Coast Labs.			
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.			
Unlikely to have any environmental impact apart from delaying the DWER by 27 days in evaluating and responding to the AER & AACRs.			
Cause (or suspected cause) of non-compliance:			
Charles Williams, of West Coast Labs, is extremely busy completing AERs for multiple clients all within the same lodgment and due date window. The July 2023 revision by the DWER to our Licence removed the previously applied for and granted extension allowing a reasonable workload for the report writer while still remaining within lodgment dates..			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Application was made to DWER on the 13 Feb 2024, who allowed additional time to lodge on the 14 Feb 2024.			
Was this non-compliance previously reported to DWER? Yes			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 13 / 02 / 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:	Condition 10 (Table 5) Trigger value Exceedances	Date(s) of non-compliance:	See table			
Details of non-compliance:						
WQ1 Trigger value exceedances						
		WQ1 - SmithBrook	WQ1 - SmithBrook	WQ1 - SmithBrook	WQ1 - SmithBrook	
		09-Mar-23	19-Jun-23	19-Sep-23	07-Dec-23	
Analyte	WQ1 Emission Targets	Test Result	Test Result	Test Result	Test Result	
DATE	17-Jul-23	09-Mar-23	19-Jun-23	19-Sep-23	07-Dec-23	
pH	>=6.0 & <=8.5	logarithmic	-	-	9.5	-
Phosphorous - Ortho	0.05	mg/L	1.4	0.8	-	1.8
Oil & Grease	5	mg/l	-	-11.0	-19.0	-12.0
Copper	0.2	mg/L	-	-	#VALUE!	-
Zinc	2	mg/L	-	-	#VALUE!	-
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.						
The environmental impact of all exceedances would be limited to the water body described WQ1 as during all of 2023 no water passed the dam wall into the downstream Smith brook. Due to reduce annual rainfall for the year.						
Cause (or suspected cause) of non-compliance:						
The cumulative effect of upstream emissions from L1 and the associated wastewater system. Also of note is the large number of land birds and water birds that nest on or near the water body throughout most of the year. The Light Industrial Area to the north through west of the dam is a significant catchment containing many businesses involving fuel depots, trucking, mechanical and vehicle both light & heavy, spray painting, timber processors and dressers, wood and metal fabricators, container recyclers and other sundry workshops. The contribution of oil & grease is more expected than not from this area. Our understanding is that deep sewage is NOT available in this area, so all the septic systems sit atop a very steep grade (nearly vertical in some areas) angling toward the water body in question.						
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:						
The waste system is under review as noted in various other non-compliance reports contained herewith.						
Was this non-compliance previously reported to DWER? 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 :		Signature:	
Name: (printed)		Name: (printed)	
Position:	Director	Position:	
Date:	3-5-24	Date:	
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.