



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, 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:	L8839/2014/1	Licence file number:	DER2014/001936
Licence holder name:	Shire of Ravensthorpe		
Trading as:	Shire of Ravensthorpe		
ACN:	No ACN held by the Shire, but do have ABN 52 674 538 418		
Registered business address:	65 Morgan Street RAVENSTHORPE WA 6346		
Reporting period:	1 / 4 / 2022 to 31 / 3 / 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 in 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

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
62 and 64	See Annual Environmental Report

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:	3	Date(s) of non-compliance:	Identified on 2 May 2023, but likely to have occurred during the reporting period
Details of non-compliance:			
Uncontaminated stormwater not directed to the stormwater management system.			
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.			
Stormwater running across the active landfilling area to leachate pond			
Cause (or suspected cause) of non-compliance:			
Suspected cause of this problem is insufficient landfill cover which has the ability to absorb rainfall, rather than percolating quickly through the waste below.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Landfill cover has been increased to the prescribed 300mm. Landfill cover will be contoured to prevent water running off the edges of the landfill cover			
Was this non-compliance previously reported to DWER?			
No – this was found by DWER site audit on 2 May 2023			
<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:	4	Date(s) of non-compliance:	Identified on 2 May 2023, but likely to have occurred during the reporting period
Details of non-compliance:			
Possible acceptance of waste that does not meet the specifications listed in table 2			
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.			
Potential for incorrect waste classes and or contaminants to be deposited at the Premises without the Licensee's knowledge.			
Cause (or suspected cause) of non-compliance:			
Cleanaway was appointed as contractor for Waste Collection Services in 2019 for a 5yr contract for the kerbside collection of refuse and recycling to the Shire of Ravensthorpe and the Shire of Jerramungup. Cleanaway also has several direct commercial contracts with private businesses. They dispose of waste at the Premises between Monday to Friday at different times each day depending on their route and distances they have to travel. The Premises is only open for 3 hours p/day, 4 days/week. Cleanaway was given permission to access the Premises to dispose of waste outside of these opening hours and self-report at the end of each month. Investigations have revealed that no agreement and indemnification is in place to ensure waste acceptance compliance.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The Licensee has developed a new waste acceptance procedure to be signed by Cleanaway.			
Was this non-compliance previously reported to DWER?			
No – this was found by DWER site audit on 2 May 2023			
<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:	6	Date(s) of non-compliance:	Identified on 2 May 2023, but likely to have occurred during the reporting period
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Details of non-compliance:

Vehicle batteries not stored in a covered area on hardstand
Contaminated waste stored outside landfilling area (recent aircraft incident class II waste)

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.



Photograph 3: Vehicle batteries not stored in a covered area.

Possible leakage of battery chemicals into the environment, although no such leakage has been observed.

Cause (or suspected cause) of non-compliance:

The correct operating procedure was not in place and clear direction was not provided to maintenance and operating staff of licensing requirements.

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

All batteries were moved onto pallets and are being stored on a concrete floor in a lockable shed adjacent to the tip attendant office.
The contaminated solid waste from the aircraft incident has been moved to the landfill cell and correctly covered.

Was this non-compliance previously reported to DWER?

No – this was found by DWER site audit on 2 May 2023

☐ Yes, and

☐ Reported to DWER verbally

Date: / /

☐ 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	Date(s) of non-compliance:	Identified on 2 May 2023, but likely to have occurred during the reporting period
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Details of non-compliance:

Landfill leachate is stored outside the landfill leachate pond (leachate is ponding in between the leachate pond and low point of landfill cell)

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.



Photograph 8: Landfill leachate ponding in between leachate pond and low point of landfill cell

Cause (or suspected cause) of non-compliance:

The correct operating procedure for leachate management and shut off valve usage was not in place causing some of the leachate to pool outside of lined leachate pond. Insufficient landfill covering enabled water to percolate quickly and not be absorbed.

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

Subsequent training of landfill maintenance staff and the development of correct operating procedure and management plan.
Landfill cover has been increased to the prescribed 300mm thickness which will increase absorption capacity and reduce water flow.
Concrete hardstand, shed, pump and sprinkler system were also put in place adjacent to the leachate pond area to assist with dispersion of leachate water onto the active landfill area for evaporation.

Section E – Details of non-compliance with licence condition	
Was this non-compliance previously reported to DWER? No – this was found by DWER site audit on 2 May 2023	
<input type="checkbox"/> Yes, and	
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<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:	9	Date(s) of non-compliance:	Identified on 2 May 2023, but likely to have occurred during the reporting period
Details of non-compliance:			
Size of tipping area larger than 30 meters in length			
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.			
Increased volumes of windblown waste			
Cause (or suspected cause) of non-compliance:			
The correct operating procedure for containment of the tipping area was not in place and clear direction was not provided to the maintenance staff of licensing requirements.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Subsequent training of landfill maintenance staff and the development of correct operating procedure and management plan.			
Was this non-compliance previously reported to DWER? No – this was found by DWER site audit on 2 May 2023			
<input type="checkbox"/> Yes, and			
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<input type="checkbox"/> Reported to DWER in writing		Date: / /	

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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:	10	Date(s) of non-compliance:	Identified on 2 May 2023, but likely to have occurred during the reporting period
Details of non-compliance:			
Landfill cover not applied to putrescible waste as per license condition 10, table 6			
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.			
Increased volume of windblown waste and leachate generation.			
Cause (or suspected cause) of non-compliance:			
The correct operating procedure for landfill covering was not in place as clear direction was not provided to maintenance staff of the licensing requirements.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Subsequent training of landfill maintenance staff and the development of correct operating procedure and management plan. Landfill cover of 300mm is being applied to putrescible waste as per Table 6 and additional stockpiles of cover material have been deposited in the landfill cell to ensure sufficient availability of cover material at all times.			
Was this non-compliance previously reported to DWER?			
No – this was found by DWER site audit on 2 May 2023			
<input type="checkbox"/> Yes, and			
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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:	14	Date(s) of non-compliance:	Identified on 2 May 2023, but likely to have occurred during the reporting period
Details of non-compliance:			
Windblown waste is not being collected on a weekly basis			
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.			
Windblown waste spilling over into the environment surrounding the Premises during times of strong seasonal wind conditions			
Cause (or suspected cause) of non-compliance:			
The correct operating procedure and fixed time periods for removal of windblown waste was not in place and no clear direction was provided to the landfill operating staff of the licensing requirements.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Additional time was allocated to the landfill operator's weekly schedule to allow for regular collection of windblown waste			
Was this non-compliance previously reported to DWER?			
No – this was found by DWER site audit on 2 May 2023			
<input type="checkbox"/> Yes, and			
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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 and 22	Date(s) of non-compliance:	Identified on 2 May 2023, but likely to have occurred during the reporting period
Details of non-compliance:			
The Premise does not have a standing water level (SWL) monitoring procedure			
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.			
Although the historical lack of groundwater has been noted in the License document it remains prudent for the presence of groundwater to be monitored to ensure early detection of chemical parameters as in Table 9			
Cause (or suspected cause) of non-compliance:			
The correct operating procedure to monitor for the presence of groundwater as well as the correct equipment to do so was not in place. Due to the lack of regular inspections some of the boreholes have become blocked and difficult to find.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>The Licensee obtained copy of the Hydrogeological Assessment Report done by GHD at the Premises in 2012 to determine the groundwater regime. The site geology of the Premises is generally sandy overlying a granitic/diorite bedrock. Drilling was done at 6 locations to the following depths- BHO1(12m), BHO2(6.5m), BHO3(8.5M), BHO4(9m), BHO5(21m) and BH06(7m). Despite the absence of groundwater detected during drilling, 5 of the 6 investigation locations were constructed as groundwater monitoring wells. Historical records of groundwater monitoring done at the Premises also revealed no groundwater detected. Dip meter testing done with assistance of environmental staff from a local mine at BHO1 on 16/08/2023 recorded no groundwater present. Due to weather conditions and inaccessibility the other boreholes could not be tested on the same day. They have been scheduled for the next available timeslot. Thereafter these tests will be conducted in regular intervals to monitor the possible presence of groundwater. The procedure nominated by GHD for measuring groundwater was rudimentary (including a rag and rope) and has become outdated. A new procedure was shown to the Licensee by a local mining company using a Heron Dipper T2 water level meter. The Licensee has purchased a similar meter and is awaiting delivery. The Licensee has also been liaising with a Geotechnical drilling company to come and inspect BH02-BH06 to determine if serviceable or if new boreholes should be drilled.</p>			

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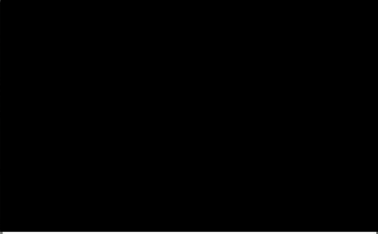
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Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	25	Date(s) of non-compliance:	Identified on 2 May 2023, but likely to have occurred during the reporting period
Details of non-compliance:			
The operating and maintenance staff at the Premises are not aware of the license conditions			
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.			
Cause (or suspected cause) of non-compliance:			
<p>The indoor staff who worked for the Licensee at the time the Premises was constructed knew what needed to be done and probably explained this to site operators and probably kept a close eye on them, but may not have provided actual copies of the Site Management Plan to the operating and maintenance staff.</p> <p>The Licensee has experienced high staff turnover in recent times and new staff have not been trained in the waste management procedures.</p> <p>This loss of corporate knowledge and a lack of documented procedures and training for site staff has contributed significantly to the Licensee not meeting the License conditions.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>All current indoor, operating and maintenance staff have a copy of License conditions and any new staff member joining the team will receive a copy and training as part of their induction.</p> <p>One indoor staff member attended an external training course provided by WALGA entitled "Introduction to Waste Management" in Perth</p> <p>Training on the site management plan, license conditions and standard operating procedures for current staff has commenced and will be ongoing and reviewed quarterly</p>			
Was this non-compliance previously reported to DWER?			
No – this was found by DWER site audit on 2 May 2023			
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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:	26	Date(s) of non-compliance:	Identified on 2 May 2023, but likely to have occurred during the reporting period
Details of non-compliance:			
The Annual Environmental Report and Annual Audit Compliance Report for the reporting period 1 April 2021 to 31 March 2022 and 1 April 2022 to 31 March 2023 have not been submitted within the required time frame of 60 days after end of the annual period (31 May)			
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 impact			
Cause (or suspected cause) of non-compliance:			
High staff turnover in the Infrastructure Services Department and the Environmental Health area including periods where multiple positions were vacant has created a backlog and some deadlines have been missed. New staff members have joined without hand over, training and operating procedures from previous staff.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
2021-2022 Report submitted on 06/02/2032 Development of a detailed operating procedure for annual reporting that includes data capturing, conversions and methods as well as accurate and up to date records that are easily accessible.			
Was this non-compliance previously reported to DWER?			
No – this was found by DWER site audit on 2 May 2023			
<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:		Position:	
Date:		18 August 2023	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.