

ANNUAL RETURN

Information on this form is required in accordance with the conditions of your licence or approval issued under part 5 of the *Waste Management and Pollution Control Act* or part 7 of the *Water Act*.

Failure to provide the information requested on this form and/or the provision of false or misleading information is an offence under the legislation and you may be liable to heavy penalties.

LICENCE/APPROVAL NO.	EPL223
REPORTING PERIOD	2nd Nov 2021 to 2nd November 2022

Section 1. Licence/Approval Holder Details

Please check your business details and contact details including 24 hour emergency response in NT EPA online and/or on page one of your licence.

Are these details correct?

- ☒ Yes Go to Section 2
- ☐ No Please correct your details by updating in NT EPA Online or complete the table below.

Licence holder	
Legal Entity Name:	
ABN:	
Registered Business Address:	
Postal Address:	
Contact Person:	
Position Title:	
Contact Details:	
b/h:	
mobile:	
email:	
Location of premises	
Address:	
24 hour emergency response	
Position Title:	
phone:	
mobile:	

Section 2. Statement of Compliance

Were all conditions of the licence/approval complied with during the reporting period?

Yes Proceed to Section 4.

No x Complete details below (add more rows if required)

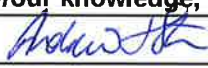
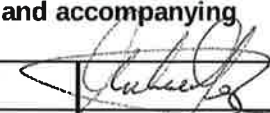
Details of Non-compliance				
Condition number	Date of non-compliance (dd/mm/yy)	Was NT EPA notified? (Yes / No)	If yes, date NT EPA notified (dd/mm/yy)	If yes, how was NT EPA notified? (e.g. phone, email, Pollution Hotline)
		If no, complete Section 3		
Refer to show cause response dated 19/12/22 and attached				

Section 3. Report of Non-compliance

Please supply the following details for each non-compliance not reported to the NT EPA identified in Section 2. Use a separate page for each non-compliance.

The date and time of the non-compliance.
When the non-compliance was detected and by whom.
The actual and potential causes and contributing factors to the non-compliance.
The risk of environmental harm arising from the non-compliance.
The action(s) that have or will be undertaken to mitigate any environmental harm arising from the non-compliance.
Corrective actions that have or will be undertaken to ensure the non-compliance does not reoccur.
If no action was taken, why no action was taken.

Section 4. Signature and Certification

This declaration must only be signed by a person(s) with the legal authority to sign it. The ways in which the application may be signed, and the people who may sign the application, are set out in the categories below.			
If the licence holder is:	Tick	The application must be signed and certified by one of the following:	
An individual	<input type="checkbox"/>	The individual.	
A partnership	<input type="checkbox"/>	A partner.	
A company	<input type="checkbox"/>	The common seal being affixed in accordance with the <i>Corporations Act</i> , or	
	<input checked="" type="checkbox"/>	Two directors, or	
	<input type="checkbox"/>	A director and a company secretary, or	
A public authority	<input type="checkbox"/>	If a proprietary company that has a sole director who is also the sole company secretary – by that director.	
	<input type="checkbox"/>	The Chief Executive Officer (CEO) of the public authority, or	
	<input type="checkbox"/>	By a person delegated to sign on the public authority's behalf in accordance with its legislation (Please note: a copy of the relevant instrument of delegation must be attached to this application).	
I/We hereby declare that the information provided in this Annual Return and accompanying documents is to the best of my/our knowledge, true and correct.			
Signature		Signature	
Name (printed)	ANDREW STONE	Name (printed)	B. Michael Ferguson
Position	DIRECTOR	Position	DIRECTOR
Date	21-12-2022	Date	21-12-2022
Seal (if signing under seal):			



File reference

NTEPA2022/0166-001~0001

Northern Territory Environment Protection Authority

Attn. Carissa Liddle

GPO 3675

Darwin NT 0801

19 December 2022

By Email: waste@nt.gov.au

**Re Alleged contraventions with the Waste Management and Pollution Control Act 1998 (the Act) –
Show Cause Submission**

Dear Ms Liddle.

I refer to your letter dated 5 December 2022 which was sent to Andrew Stone. I am a Director of Rentokil Initial Pty Ltd (**Rentokil Initial**) and the Operations Director Australia and am responding to your letter on behalf of Rentokil Initial.

We appreciate the opportunity for Rentokil Initial to 'show cause' as to why further compliance and/or enforcement action should not proceed. Kindly consider our submission below.

A. Reasons for temporary non-compliance situation

1. Environment Protection Licence 223 (EPL 223) - 6/66 Coonawarra Rd, Winnellie premises
("Coonawarra Rd. Premises") / 414 Stuart Hwy, Winnellie ('Stuart Hwy Premises')

Rentokil Initial conducted its operation of hygiene waste services, namely collecting, transporting and storing of clinical and related wastes (**'Hygiene Waste Services'**), in addition to other hygiene services and pest control services, from the Coonawarra Rd Premises between 2017 and June 2020 under EPL 223. At the time EPL 223 was issued in 2017 it covered the correct type of waste services and was registered under the correct address details, i.e. the Coonawarra Rd Premises address.

In December 2019, Rentokil Initial acquired the assets of a pest control business, operating under the name *'Northern Territory Pest and Weed Control'*, which operated out of the Stuart Hwy Premises. Rentokil Initial decided to move its operations to the Stuart Hwy Premises as part of the integration of the acquired business during Quarter 2 of 2020. During this transition period, Rentokil Initial commenced operating from the Stuart Hwy Premises; the operations included Hygiene Waste Services

Further, Janet Phillips left the Coonawarra Rd Premises address as the relevant address on the annual return form instead of updating the address to the actual place of operations which was at the Stuart Hwy Premises at that point in time.

As mentioned, Janet Phillips is no longer with Rentokil Initial so we have not had a chance to further investigate why these two inaccuracies occurred. Our assumption is that due to the information regarding the address details of the premises being pre-populated on the annual return form, Janet missed updating the address.

The incorrect selection of waste category on the 2 November 2020 annual return form may have occurred due to Janet being new to the role with other factors as set out under A. 1. **(above)** likely to have contributed to the inaccuracies in the annual return for EPL 223. When Janet Phillips then lodged the 2021 annual return form one year later, presumably she simply accepted all the details as per the annual return of the year prior.

3. Late Payment of annual fees for EPL 223

The fact that Rentokil Initial failed to advise the EPA of the new mailing address when its operations moved to the Stuart Hwy Premises is likely to have caused that the mail was not received or only received after significant delays. Further, changes in the administrative team due to the integration of the newly acquired business would have contributed to emails being missed.

B. **Action(s) taken by Rentokil Initial to ensure compliance in future**

1. EPL License management via "Ratify" system

"Ratify" is an effective document management system provided to Rentokil Initial by a 3rd party service provider. The system issues early warning alerts when a particular document needs to be attended to, for example, when a license expires or an annual return is due. Ratify can be accessed by the responsible individuals with a secured mobile application and via Web browser. Alerts/notifications are sent to the respective individuals through email and SMS. So far, Rentokil Initial has been using the Ratify system to track individual technician's licences and site inductions (for customer sites).

Rentokil Initial has now extended the use of Ratify to include business licenses (incl. EPA licenses) and registrations. Each business manager will have a user account and will get assigned the licenses required for their states and territories. Annual license review and return dates will be uploaded onto the Ratify system to ensure a timely return (including payment of fees).

Any unattended alert will get escalated to Rentokil Initial's Operations Excellence Director.



Let us know if you would like us to provide further details regarding any of the above. Please feel free to contact me via mobile on 0435 023 711 or via email: michael.jorgensen@rentokil-initial.com

Kind regards,

A handwritten signature in black ink, appearing to read 'Michael Jorgensen'.

Michael Jorgensen
Operations Director, Australia