

## 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.

<b>LICENCE/APPROVAL NO.</b>	EPL 246-01
<b>REPORTING PERIOD</b>	1 <sup>st</sup> Aug 2019 to 31 <sup>th</sup> July-2020

### 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.

<b>Licence holder</b>	
Legal Entity Name:	Department of Health
ABN:	67 234 261 446
Registered Business Address:	105 Rocklands Drive Tiwi Northern Territory 0810
Postal Address:	GPO Box 41326, Casuarina Northern Territory 0811
Contact Person:	Ms Jodi Nobbs
Position Title:	Snr. Director Infrastructure & Support Services (TEHS)
Contact Details:	Ms Jodi Nobbs
b/h:	08 8922 6901
mobile:	0428 869 401
email:	RDHWasteManagement.DoH@hotmail.com
<b>Location of premises</b>	
Address:	105 Rocklands Drive Tiwi Northern Territory 0810
<b>24 hour emergency response</b>	
Position Title:	Mr Neil Bond (Snr Director Engineering Services-(DIPL))
phone:	08 8922 8523
mobile:	0417 879 971

## Section 2. Statement of Compliance

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

Yes Proceed to Section 4.

No Complete details below (add more rows if required)


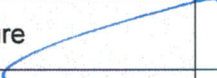
Details of Non-compliance				
Condition number	Date of non-compliance (dd/mm/yy)	Was NT EPA notified? (Yes / No)	If yes, date NT EPA notified (dd/mm/yy)	If yes, how was NT EPA notified? (e.g. phone, email, Pollution Hotline)
		If no, complete Section 3		
C37 – C41	10-07-2020	Yes	23-07-2020	Email Communication
C49	10-07-2020	Yes	23-07-2020	Email Communication
C51	10-07-2020	Yes	23-07-2020	Email Communication

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

## 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	
	<input type="checkbox"/>	If a proprietary company that has a sole director who is also the sole company secretary – by that director.	
A public authority	<input type="checkbox"/>	The Chief Executive Officer (CEO) of the public authority, or	
	<input checked="" 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).	
<b>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.</b>			
Signature		Signature	
Name (printed)	Jodi Nobbs	Name (printed)	Jeff Tinsley
Position	Snr. Director Infrastructure & Support Services (TEHS)	Position	Director Clinical Infrastructure, INFRASTRUCTURE SERVICES
Date		Date	
Seal (if signing under seal):			

**Response to DoH non-compliant with EPL246 conditions.**

Date: 20<sup>th</sup> July 2020

1. *During previous renewal DoH personnel advised NT EPA officers that it would not be conducting the activity on a commercial or fee for service basis into 2019/2020. Further, it would not require renewal of this licence as treatment by autoclave would be to meet the needs of DoH operated facilities only. Is this currently not the case? If not, why not?*

**Response:** This is incorrect and there is no change to the existing operations. As discussed, the previous supervisor of the area is no longer employed by TEHS and the new waste manager is James Rohan Akunoori. It is unknown why the information was provided by the previous representatives as there has been no intention to cease the commercial or fee for service basis that the hospital provides. Cessation would risk the operations of Darwin Private Hospital, as well as other medical clinics, pathology services and veterinary clinics across the top end region.

2. *You are encouraged to contact the NPI officer at NT EPA and advise whether air emission limits are above or below the NPI thresholds.*

**Response:** A Request for Service has been issued to the Department of Infrastructure Planning and Logistics to undertake formal air emissions testing. A copy of the report will be provided to NT EPA within 14 days.

3. *You may be non-compliant with some conditions of EPL159. Please provide clarification on the below:*

*C37 – C41: The licensee must undertake an environmental audit within 12 months from the commencement date of the licence; that is by 31 July 2019.*

*The NT EPA has not received any correspondence in relation to the scope, commencement or completion of this audit.*

**Response:** Acknowledged and as discussed with the NT EPA representative, the poor management of administrative requirements associated with this service resulted in the transition of services within the health service, from engineering to myself, and recruitment and appointment of a new Supervisor to ensure compliance regulatory and legislative requirements. TEHS acknowledges the non-compliance and provides a written undertaking that the Audit will be conducted by the Top End Health Service Risk Manager, Tina Fleming, to ensure appropriate review of the operations is undertaken. Ms Fleming will contact the NT EPA representative to confirm the level of audit required and if external consultants are required they will be contracted accordingly. Once the scope of audit required is confirmed, a timeframe for completion will be provided. The completion of the audit is a priority of the health service.

- *C49: Submission of an Environmental Emergency Response Plan by 31 January 2019, written by a suitably qualified professional consultant.*

The NT EPA has not received an Environmental Emergency Response Plan. The "Waste Management Building Emergency Response Plan" is not relevant to the environmental risks posed by this activity. Further:

- o It is not written by a professional consultant
- o It has not been reviewed since 2013
- o It has not been changed or amended since previous licence renewal
- o It does not meet the licence criteria to address procedures for responding to emergencies associated with the activity that may cause environmental harm.

**Response:** As acknowledged, Top End Health Service is non-compliant with the previous conditions and the staff involved are no longer employed by the health service. Their cessation of on-going employment is attributed to mismanagement of such matters. On 17.07.2020, the A/ED Strategy & Planning provided confirmation to the NT EPA that the development of appropriate documentation to address C49 and C51 would be outsourced to a professional consultant to remediate the non-compliance. NT Government Procurement processes are in progress and it is anticipated that a consultant will be on-boarded by week ending 25.07.2020. The RFS has included information to the consultants that this matter is time sensitive and provision of the documentation will be provided to the NT EPA within a 6-week period.

- C51: Submission of a Consultation and Communication Plan by 31 January 2019, written by a suitably qualified professional consultant.

The NT EPA has not received a Consultation and Communication as requested by this condition. The "RDH Waste Management Communication Plan" is not sufficient. Further:

- o It is not written by a professional consultant
- o It has not been changed or amended since previous licence renewal
- o It does not meet the licence criteria to address procedures for communicating with persons who are likely to have a real interest in, or be affected by, the activity.

**Response:** As above.

Also, and further to the above, you should use this as an opportunity to provide clarification or updates on the volume of commercial or fee for service waste handled and any other areas of the licence you consider are no longer relevant or require amending/tweaking.

**Response:** Top End Health Service confirms that the volume of commercial waste handled within the license is appropriate and there are no other amendments required.

Thank you.