



## 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:	L6112/1996/11	Licence file number:	DER2015/001535
Licence holder name:	Borrello Holdings (WA) Pty Ltd (The Company)		
Trading as:	Gingin Meatworks		
ACN:	150 463 442		
Registered business address:	Lot 4 Adelaide Street, Hazelmere ,WA, 6055.		
Reporting period:	1 / 1 / 23                      to    31 / 12 / 23		

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
Category 15: Abattoir - Premises on which animals are Slaughtered	10,988.96 tonnes HSCW
Category 83: Fellmongering – premises on which animal skins are dried, curd or stored	100,257 animal skins/hides

<b>Section D – Statement of actual Part 2 waste discharge quantity</b>	
Provide the actual Part 2 waste discharge quantity for this reporting period. Supporting documentation is to be attached.	
<b>Prescribed premises category</b>	<b>Actual Part 2 waste discharge quantity</b>
Category 15: Abattoir - Premises on which animals are Slaughtered	Total nitrogen: 404.1 kg/ha Total phosphorus: 83.9 kg/ha
Category 83: Fellmongering – premises on which animal skins are dried, curd or stored	NA

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 6 Emissions to land loading limits, Table 6; Irrigation area emissions limit	Date(s) of non-compliance:	This noncompliance was an accumulation over the reporting period of 2023 (12 months).
Details of non-compliance:			
<p>The total accumulated loadings to land of Total Nitrogen and Total Phosphorus during the reporting period 1/01/23-31/12/23 exceeded license maximum limits, for total nitrogen our limit is 300kg per hectare per annum and for total phosphorus our maximum limit is 50kg per hectare per annum. Our actual loading to land over the reporting period was Total nitrogen 404.1 kg per hectare and for Total phosphorus it was 83.9 kg per hectare.</p>			
<p>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.</p>			
<p>There was no immediate or short-term effect on the environment observed in regards to this non compliance. However, there is potentially longer term impact associated with increased nutrient loadings onto the soils in our irrigation area and the possibility for leaching to occur impacting ground water or the surface water ( Lennard Brook).</p> <p>Ongoing quarterly groundwater and soils monitoring show some elevated nutrients in soils at the irrigation area and in groundwater at the site. The risk of these elevated nutrients are being investigated as apart of the notice of site contamination.</p>			
Cause (or suspected cause) of non-compliance:			
<p>The cause of noncompliance was mainly due to the large increase in our wastewater volume discharged to land during the reportable period and the higher than usual nutrient levels contained in our waste water. The higher waste water volumes and the higher nutrient levels within the waste water may be due to the additional processing of beef tripe that commenced in September 2023, which was not anticipated to exceed license limits.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>The company will keep a running total on loadings to land for 2024. The company will also review the operating parameters of the waster water treatment system (WWTS) to see where they might be able to make improvements. This process will include engaging a waste water consultant to advise us on possible improvements to our WWTS. Additional, The company will continue to investigate water usage at the site and see if there are any areas where they can reduce usage and input into the WWTS.</p> <p>The company are also working on preparing a Nutrient Reduction/Wastewater Improvement Plan (WIP)) which will provide details on measures that can be implemented to keep nutrient loading at the site bellow licensed levels. The company have also engaged Ramboll to provide environmental consulting services.</p>			
Was this non-compliance previously reported to DWER? <b>No</b>			

Department of Water and Environmental Regulation

<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 license holder was non-compliant at a time during the reporting period.			
Condition no:	Condition 16 Failure to report a noncompliance within the 14 days as required	Date(s) of non-compliance:	February 2024
Details of non-compliance:			
This noncompliance was the failure to report a noncompliance within the 14 days as required by our license conditions the noncompliance was in relation to condition 6 nutrient loadings to soil during the preparation of figures for our annual report we became aware that we had exceeded our emission to land limit of Total nitrogen and Total Phosphorus, our license limits are Total nitrogen 30kg/ha/py, Total phosphorus is 50kg /ha/yr. our actual total emissions where Total Nitrogen 404.1kg/ha/py, Total Phosphorus 83.9kg/ha/py.			
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.			
There is no immediate environmental impact as the noncompliance was a result of discharge over the entire year it was not a one of type of incident, longer term there could be some environmental impact as a result of nutrient build up in the soil weather this could affect ground water or surface water in the longer term is hard to tell if there is any effect in the ground water it should show up in our quarterly ground water monitoring.			
Cause (or suspected cause) of non-compliance:			
Irrigation of waste water onto our waste water disposal areas irrigation plots A and B, there was no running total nutrient loading records being kept so it was not until we calculated the yearly total that we realized that we had exceeded our license limits.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
We will now keep a running total of the nutrient loadings irrigated to land this will give us a constant awareness of where we are in relation to reaching our limits with nutrient loadings also we will review our waste water treatment systems to look for improvements as well we will look into our pre pond screening system there may be options to improve these as well, waste water treatment systems are typically sensitive to change and are also quite technical so we will have to engage specialist input this may take some time as even when changes are made pond systems can take weeks if not months to readjust to any changes.			
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			



Department of Water and Environmental Regulation

Please use a separate page for each condition with which the license holder was non-compliant at a time during the reporting period.			
Condition no:	General	Date(s) of non-compliance:	This noncompliance was an accumulation over the reporting period of 2023 (12 months).
Details of non-compliance:			
The Company has not reported on the number of hides/skins processed through fell mongering operations (Category 83).			
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.			
Technical Non- compliance for not providing the required data.			
Cause (or suspected cause) of non-compliance:			
Administrative error. Data was provided by the Company in the 2023 AER as beef hide and sheep skin movements, not hides processed.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The company will submit all future reports to our environmental consultants for review prior to submission in the future the consultants will confirm that the reports and any attachments are complete accurate and in the correct formats before submission. The company has engaged Ramboll environmental as consultants for this work.			
Was this non-compliance previously reported to DWER? <b>No</b>			
<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 license holder was non-compliant at a time during the reporting period.			
Condition no:	General: Assessed production capacity	Date(s) of non-compliance:	This noncompliance was an accumulation over the reporting period of 2023 (12 months).
Details of non-compliance:			
<p>The company has not reported on the number of hides/skins processed through fellmongering operations (Category 83).</p> <p>All skins/hides from animals slaughtered at the site were processed via the hide shed resulting in The company processing 119,212 animal skins/hides between 1 January 2023 and 31 December 2023, which exceeds the assessed production capacity of 60,500.</p>			
<p>What was the actual (or suspected) environmental impact of the non-compliance?</p> <p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
<p>No environmental impact has resulted from breach of Condition 3. All salt waste is collected and disposed of off-site by contractor Chittering Septic Service, who provide contaminated waste tracking forms. Salt waste disposal receipts for 2023 are attached.</p>			
Cause (or suspected cause) of non-compliance:			
<p>Administrative/processing error.</p> <p>Two years ago when the company amended the site operating license to amend total slaughter limit from a number of head and AHSCW to only a HSCW tonnes per annum, due to processing small stock. The company did not realize that the fell mongering category was still limited to a numerical limit of units, which resulted in a discrepancy between the license limit from slaughter totals to skin and hide processing total limit.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>The company propose to requesting a license amendment to increase the assessed production capacity of the site (Category 83) or to remove the numerical limit and change it to all skins and or hides produced onsite but not to include skins or hides from other sites, will be determined.</p>			
Was this non-compliance previously reported to DWER? <b>No</b>			
<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 license holder was non-compliant at a time during the reporting period.			
Condition no:	Condition 7.	Date(s) of non-compliance:	This noncompliance was an accumulation over the reporting period of 2023 (12 months).
Details of non-compliance:			
<p>Technical Non-compliance for not providing the correct data in the correct format.</p> <p>Data for Condition 7, table 7 was Not provided in tabular form. Some information is unclear or not provided. The following has not been provided:</p> <ul style="list-style-type: none"> <li>• Number and species of live animals received;</li> <li>• Daily number of skin/hides processed in the fellmongering shed;</li> <li>• Wastewater discharged to Anaerobic Pond 1; and</li> <li>• Volume of pond sludge removed.</li> </ul>			
<p>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.</p>			
There are no known environmental impact for this noncompliance.			
Cause (or suspected cause) of non-compliance:			
The cause of the noncompliance was due to human error, lake of training and no final review of the annual environmental report.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The company will submit all future reports to our environmental consultants for review prior to submission in the future the consultants will confirm that the reports and any attachments are complete accurate and in the correct formats before submission. The company has engaged Ramboll.com environmental as consultants for this work.			
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 license holder was non-compliant at a time during the reporting period.			
Condition no:	Condition 8 Emissions and discharge	Date(s) of non-compliance:	This noncompliance was in the annual environmental report for 2023.
Details of non-compliance:			
<p>Technical Non- compliance for not providing the monitoring data in the format required, and not providing an assessment and interpretation of the data.</p> <p>The following has not been provided:</p> <ul style="list-style-type: none"> <li>• Treated wastewater monitoring data in tabulated and graphical form; only the raw results from the NATA lab have been provided;</li> <li>• An assessment and interpretation of the data. (Historical data and loading limits over the most current 5 year period has been provided).</li> </ul>			
<p>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.</p>			
<p>There was no environmental impact for this noncompliance the noncompliance was a clerical reporting shortfall in relation to our annual reporting requirements.</p>			
Cause (or suspected cause) of non-compliance:			
<p>The cause of the noncompliance was due to a failure of to follow the exact detail in our license reporting requirements.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>The company will have all future reports and the like reviewed and approved by our environmental consultant prior to submission, we have engaged Ramboll as environmental consultants.</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**

Department of Water and Environmental Regulation

Please use a separate page for each condition with which the license holder was non-compliant at a time during the reporting period.			
Condition no:	Condition 9 Surface water monitoring.	Date(s) of non-compliance:	This noncompliance was in the annual environmental report for 2023.
Details of non-compliance:			
<p>Technical Non-compliance for not providing the monitoring data in the format required.</p> <p>Surface water data was not provided with the 2023 AER. The company stated in 2023 AER that there was insufficient rainfall to create enough surface water for the winter creek on the property to flow.</p>			
<p>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.</p>			
<p>There was no environmental impact for this noncompliance the noncompliance is technical not physical.</p>			
Cause (or suspected cause) of non-compliance:			
<p>The cause of the noncompliance was due to a lack of rainfall to create a flow in the gully / winter creek that runs through the property. The gully or winter creek used to flow for 2 or more months every year but as the conditions dry out and weather patterns have changed the gully / winter creek does not have a reliable winter flow this was not the first time that we have not been able to obtain samples due to no flow.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>In the future if there is no data available due to events beyond our control such as weather then we will still submit a table with an explanation of why there is no data content within the table.</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 license holder was non-compliant at a time during the reporting period.			
Condition no:	Condition 10 Ground water monitoring.	Date(s) of non-compliance:	This noncompliance was in the annual environmental report for 2023
Details of non-compliance:			
<p>Technical Non- compliance for not providing the monitoring data in the format required.</p> <p>Groundwater data was not provided with the AER. There is reference to SLR 360 Environmental having completed the 2023 groundwater monitoring, however the results have not been included/attached.</p>			
<p>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.</p>			
There was no environmental impact for this noncompliance the noncompliance.			
Cause (or suspected cause) of non-compliance:			
The cause of the noncompliance was due to human error no final review of the annual environmental report and the attachments was carried out to ensure all the required information was included. The ground water monitoring was carried out by SLR Environmental, however they did not provide the data in the required format.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The company will submit all future reports to our environmental consultants for review prior to submission in the future the consultants will confirm that the reports and any attachments are complete accurate and in the correct formats before submission. The company has engaged Ramboll environmental as consultants for this work.			
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 license holder was non-compliant at a time during the reporting period.			
Condition no:	Condition 11 Soil monitoring.	Date(s) of non-compliance:	This noncompliance was in the annual environmental report for 2023.
Details of non-compliance:			
<p>Technical Non- compliance for not providing the monitoring data in the format required.</p> <p>Soil monitoring data was not provided with the AER. There is reference to SLR 360 Environmental having completed the 2023 soil monitoring, however the results have not been included/attached.</p>			
<p>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.</p>			
<p>There was no environmental impact for this noncompliance the noncompliance is information that was left out from the 2023 annual report.</p>			
Cause (or suspected cause) of non-compliance:			
<p>The cause of the noncompliance was due to human error no final review of the annual environmental report and the attachments was carried out to ensure all the required information was included, the Soil monitoring was carried out by SLR Environmental and the results and documentation is available but unfortunately was omitted from the submission of the annual report.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>The company will submit all future reports to our environmental consultants for review prior to submission in the future the consultants will confirm that the reports and any attachments are complete accurate and in the correct formats before submission. The company has engaged Ramboll environmental as consultants for this work.</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:	3	Date(s) of non-compliance:	31 December 2023
Details of non-compliance:			
<p>Details of three new monitoring wells installed at the site were not provided to DWER within 30 days of construction is a non-compliance with Condition 3 as reproduced below.</p> <p><i>“The licence holder must, within 30 calendar days of constructing infrastructure in tables 2 and 3, submit to the CEO construction reports evidencing compliance with the requirements of condition 2.”</i></p>			
<p>What was the actual (or suspected) environmental impact of the non-compliance?</p> <p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
No environmental impact has resulted from breach of Condition 3.			
Cause (or suspected cause) of non-compliance:			
Procedural and administrative error.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>The company will provide an Environmental Compliance Reports (ECR) being ( in accordance with Condition 3 ) for instillation of the new monitoring wells by 28<sup>th</sup> May 2024.</p> <p>In addition, The company have engaged Ramboll to provide environmental consulting services for the site. These include:</p> <ul style="list-style-type: none"> <li>- Close out of actions from 2023 Annual Environmental Report (AER)</li> <li>- Review and improve existing systems (audit checklists and data management) to ensure operations comply with L6112/1996/11</li> <li>- Investigate the site as classified <i>Possibly contaminated – investigation required</i> under the Contaminated Sites Act 2003</li> </ul>			
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: / /	



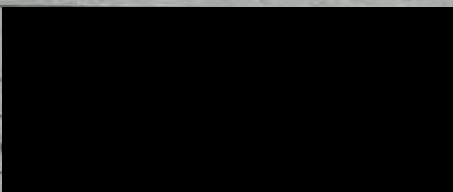

Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	3	Date(s) of non-compliance:	~August 2022
Details of non-compliance:			
<p>Details of hock processing room at the site were not provided to DWER withing 30 days of construction is a non-compliance with Condition 3 as reproduced below.</p> <p><i>“The licence holder must, within 30 calendar days of constructing infrastructure in tables 2 and 3, submit to the CEO construction reports evidencing compliance with the requirements of condition 2.”</i></p>			
<p>What was the actual (or suspected) environmental impact of the non-compliance?</p> <p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
No environmental impact has resulted from breach of Condition 3.			
Cause (or suspected cause) of non-compliance:			
Procedural and administrative error.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>The company will provide an Environmental Compliance Reports (ECR) being ( in accordance with Condition 3 ) for development of the hock processing room by 28<sup>th</sup> May 2024.</p> <p>In addition, The company have engaged Ramboll to provide environmental consulting services for the site. These include:</p> <ul style="list-style-type: none"> <li>- Close out of actions from 2023 Annual Environmental Report (AER)</li> <li>- Review and improve existing systems (audit checklists and data management) to ensure operations comply with L6112/1996/11</li> <li>- Investigate the site as classified <i>Possibly contaminated</i> – investigation required under the Contaminated Sites Act 2003</li> </ul>			
Was this non-compliance previously reported to DWER? <b>No</b>			
<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:	3	Date(s) of non-compliance:	~October 2023
Details of non-compliance:			
<p>Details of tripe processing room at the site were not provided to DWER withing 30 days of construction is a non-compliance with Condition 3 as reproduced below.</p> <p><i>"The licence holder must, within 30 calendar days of constructing infrastructure in tables 2 and 3, submit to the CEO construction reports evidencing compliance with the requirements of condition 2."</i></p>			
<p>What was the actual (or suspected) environmental impact of the non-compliance?</p> <p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
No environmental impact has resulted from breach of Condition 3.			
Cause (or suspected cause) of non-compliance:			
Procedural and administrative error.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>The company will provide an Environmental Compliance Reports (ECR) being ( in accordance with Condition 3 ) for development of the tripe processing room by 28<sup>th</sup> May 2024.</p> <p>In addition, The company have engaged Ramboll to provide environmental consulting services for the site. These include:</p> <ul style="list-style-type: none"> <li>- Close out of actions from 2023 Annual Environmental Report (AER)</li> <li>- Review and improve existing systems (audit checklists and data management) to ensure operations comply with L6112/1996/11</li> <li>- Investigate the site as classified <i>Possibly contaminated</i> – investigation required under the Contaminated Sites Act 2003</li> </ul>			
Was this non-compliance previously reported to DWER? <b>No</b>			
<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: (print		Name: (printed)	
Position:	Director	Position:	
Date:	13/03/2024	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.