



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V

Section A – Licence Details			
Licence number:	L7333/1997/10	Licence file number:	DEC7726
Licence holder:	Vasse Felix Pty Ltd		
Trading as:	Vasse Felix		
ACN:	009 1814 44		
Registered address:	Suite 1, 464 Murray Street Perth WA 6000		
Reporting period:	01/07/2021 to 30/06/2022		

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">• section C;• section D if required; and• sign the declaration in Section F.
<input checked="" type="checkbox"/> No – please complete: <ul style="list-style-type: none">• 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
25	1,245 kilolitres (See AER Appendix G)

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
25	4,041 kilolitres (See AER Table 1)

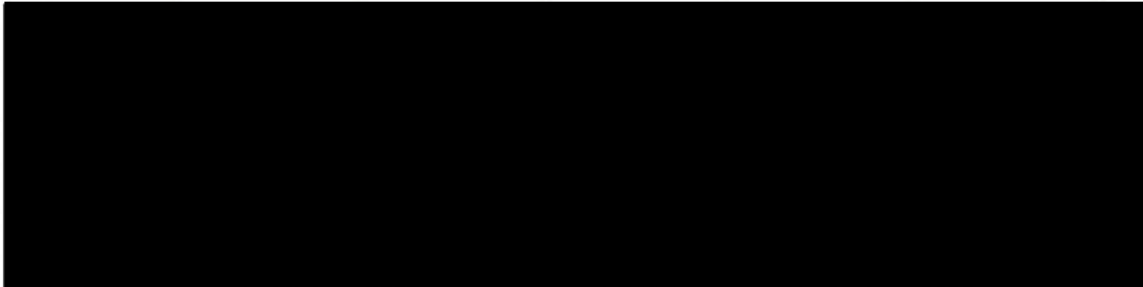
Section E – Details of Non-Compliance with Licence Condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	2.2.2	Date(s) of non-compliance:	21/7/2021
Details of non-compliance:			
<p>The BOD load limit of 30 kg/ha/day was exceeded. A monthly wastewater effluent sample was taken on 16/7/2021. The BOD concentration was 1,980 mg/L and the monthly load was 32.1 kg/ha/day, slightly higher than the licence load limit.</p> <p>Note: This exceedance was not detected until data was reviewed in June 2022 during the AER/AACR reporting process so was not reported in accordance with the licence requirements in Table 4.3.1 (see non-compliance reported within this AACR form).</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>Wastewater with a BOD load of 32.1 kg/ha was discharged to L1 leach field (as shown in the licence map). Routine visual inspections of the leach field are carried out and there was no evidence of impacts from the discharge during July 2021 (no runoff or impact on kikuyu grass). Since this event detailed assessment of potential impacts from discharge to the leach field have been carried out during 2021 and 2022. The assessments found that long term BOD loads to the leach field have not caused unacceptable impacts on the environment. These reports have been submitted to the DWER.</p>			
Cause (or suspected cause) of non-compliance:			
<p>The BOD concentration was higher than usual and in combination with higher discharge volumes due to rainfall, this has resulted in an overall higher load. Racking of barrels at this time of year may also increase the organic load to wastewater.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>The assessments carried out in 2021 and 2022 found that long term BOD loads to the leach field have not caused unacceptable impacts on the environment, but opportunities have been identified to improve the leach field function and wastewater treatment process. These reports have been provided to the DWER as part of a licence amendment which is currently underway (June-July 2022).</p>			
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: 30/6/2022	

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:	2.2.2	Date(s) of non-compliance:	31/3/2022
Details of non-compliance:			
<p>The BOD load limit of 30 kg/ha/day was exceeded. A monthly wastewater effluent sample was taken on 25/3/2022 and results were received 30/3/2022. The BOD concentration was 3,460 mg/L. The flow meter reading was re-checked on 31/3/2022 to confirm a monthly discharge load of 71.1 kg/ha/day.</p> <p>Note: The N1 form submitted on 31/3/2022 assumed 1 ha area instead of 0.8 ha (0.8 ha has historically been used and agreed with DWER for load calculations) so the load was 71.1 kg/ha/day not 56.85 kg/ha/day as reported in the N1 form.</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>Wastewater with a BOD load of 71.1 kg/ha was discharged to L1 leach field (as shown in the licence map). Visual inspection of the area carried out during routine checks did not identify any visible evidence of impacts from the discharge (no runoff or impact on kikuyu grass). Detailed assessment of potential impacts from discharge to the leach field were carried out during 2021 and 2022. The assessments found that long term BOD loads to the leach field have not caused unacceptable impacts on the environment. These reports have been submitted to the DWER.</p>			
Cause (or suspected cause) of non-compliance:			
High organic loads during vintage resulted in higher than usual BOD in the wastewater discharge.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The assessments carried out in 2021 and 2022 found that long term BOD loads to the leach field have not caused unacceptable impacts on the environment, but opportunities have been identified to improve the leach field function and wastewater treatment process. These reports have been provided to the DWER as part of a licence amendment which is currently underway (June-July 2022).			
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: 31/3/22	

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:	4.3.1	Date(s) of non-compliance:	21/7/2021
Details of non-compliance:			
The BOD load limit of 30 kg/ha/day was exceeded in July 2021 but it was not reported as the load was miscalculated and determined to be less than the limit. A discharge area of 1 ha was used to calculate a BOD load of 25.6 kg/ha/day, but the area agreed with DWER has historically be 0.8 ha which results in a BOD load of 32.1 kg/ha/day (based on a concentration of 1,980 mg/L and discharge volume of 389 kL).			
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.			
This is an administrative non-compliance. Refer to non-compliance with Condition 2.2.2 regarding potential impacts of the BOD load.			
Cause (or suspected cause) of non-compliance:			
A miscalculation using the incorrect area to calculate BOD load in kg/ha/day.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
A spreadsheet has been set up with the correct formula to calculate load (kg/ha/day). This will be used when results and discharge volume are known to ensure accurate calculation of load.			
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: 30/6/2022	
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)

Department of Water and Environmental Regulation



Date:	30 June 2022	Date:	30 June 2022
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.