



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:	L7333/1997/10	Licence file number:	DEC7726
Licence holder name:	Vasse Felix Pty Ltd		
Trading as:	Vasse Felix		
ACN:	009 1814 44		
Registered business address:	Suite 1, 464 Murray Street Perth WA 6000		
Reporting period:	01/ 07/2022 to 30/06/2023		

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
25	1,559 kilolitres (see AER)

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	3,815 kilolitres (see AER)

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	Date(s) of non-compliance:	31/1/2023
Details of non-compliance:			
A new aerated balance tank (A2) was not installed by the completion date of 31 January 2023 specified in licence (Condition 2 Table 2). The aerated tank project was completed by 24 February 2023.			
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.			
There was no environmental impact because of the delay. The intent of the completion date was to target installation prior to vintage. Vintage started on 14 February 2023. The A2 had been installed and was used to collect wastewater from the 14 February while final commissioning of the venturi pump and transfer pump occurred.			
Cause (or suspected cause) of non-compliance:			
The tank supplier advised that due to supply chain issues the installation would be delayed.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
There were no adverse effects of the non-compliance.			
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: 23/01/2023	

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:	21/12/2023
Details of non-compliance:			
The wastewater effluent sample recorded a pH of 8.6 compared to the upper licence limit of 8.5.			
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>Based on a visual inspection, minor increase in pH, and low discharge volume it was concluded that there was no environmental impact. On 5/1/2023 laboratory results were received for the wastewater sample taken on 21/12/2022. A field pH of 8.24 was measured in the discharge tank on 6/1/2023 so it is suspected that the pH was only slightly high for a short period. The volume of discharge was low in December (138 kL or 4,454 litres/day) and the BOD concentration and load were also very low (74 mg/L and 57 kg/ha/month respectively). The leach field was inspected in December and there was no visible evidence of any impact from the short period of slightly high pH wastewater discharge.</p> <p>Discharge was to L1 as depicted in the licence Schedule 1: Maps.</p>			
Cause (or suspected cause) of non-compliance:			
<p>The pH meter used to routinely check field pH was not reading correctly and was unable to be calibrated during December.</p> <p>A contributing factor was the variable pH of the influent.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>A replacement pH sensor was ordered, and a loan pH meter was used in the interim.</p> <p>At the time of the incident a project was already underway to install a new surge/balance tank to reduce surges/variability in pH and other water quality parameters.</p>			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: 23/01/2023	

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:	31/1/2023; 31/3/2023; 30/4/2023; 31/5/2023; 30/6/2023
Details of non-compliance:			
<p>A new limit for biological oxygen demand (BOD) of 1,680 kg/ha/month was included in a licence amendment in December 2022. The monthly BOD load in the wastewater discharge to the L1 leach field was higher than the licence limit on 5 occasions since December 2022.</p> <p>The BOD load in January 2023 was higher than the licence limit. A new aerated balance tank (A2) was due to be installed in February and was expected to reduce BOD in the discharge.</p> <p>The A2 tank (295 kL) was installed in February to provide a significant increase in storage capacity with the aim of balancing water quality. A venturi and pump were installed on the tank to increase aeration and the tank was also dosed with beneficial aerobic bacteria. These improvements were expected to reduce the BOD load in the wastewater discharge. During March monitoring was undertaken to assess the performance of the new A2 tank. Results indicated low dissolved oxygen (DO) and high BOD was recorded in the discharge sample.</p> <p>Vasse Felix has been in regular contact with the venturi and pump supplier since March 2023 to improve aeration in the A2 tank. To date the supplier has replaced the mechanical seals in the pump three times and replaced the pump shaft and pressure gauges. Monthly wastewater samples have continued to show high BOD load in the discharge. In July 2023 the supplier is going to provide a new set of pulleys and belts to increase the speed of the pump. The supplier is also going to visit the site to measure the air intake to the venturi to assist with further troubleshooting. Vasse Felix has also involved a third-party expert familiar with venturi pumping systems to provide independent advice.</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>Based on previous assessments and current visual inspections it was concluded that there was no environmental impact.</p> <p>The Annual Environmental Report (AER) includes monthly BOD loads to the leach field (L1) during 2022-2023 and compares the results to six years of historical data. Though the BOD loads to the leach field in the first half of 2023 are higher than the new licence limit, the loads and trends are similar to previous years. In 2021 and 2022 detailed assessments of potential impacts from discharge to the leach field were carried out by environmental consultants. The assessments found that long term BOD loads to the leach field have not caused unacceptable impacts on the environment. These reports were submitted to the DWER prior to the licence amendment.</p> <p>Routine visual inspections of the leach field were carried out at least monthly in the first half of 2023. There was no evidence of impacts from the discharge. There was no seepage from the area and no surface flow off the leach field. There were no visual impacts on the kikuyu grass.</p> <p>Discharge was to L1 as depicted in Schedule 1: Maps in the licence.</p>			
Cause (or suspected cause) of non-compliance:			

Section E – Details of non-compliance with licence condition	
The suspected cause of non-compliance is the poor performance of the venturi installed on the A2 tank. Detailed records are being kept of the ongoing investigations to determine the root cause of the poor performance.	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
Vasse Felix is committed to improving the quality of wastewater discharge. Investigations are ongoing. Once the root cause is known actions to prevent recurrence will be determined.	
Was this non-compliance previously reported to DWER?	
<input checked="" type="checkbox"/> Yes, and (The high BOD in January was reported on 13/2/2023). Results in March – June have not been reported. An active investigation is still ongoing.	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 23/01/2023

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:	30/6/2023
Details of non-compliance:			
The laboratory used for testing groundwater does not have NATA accreditation for analytical methods for sodium, potassium and calcium. The local laboratory, Vintessential Laboratories, has NATA accreditation (14572) for all routine wastewater parameters and groundwater parameters listed in the licence except sodium, potassium and calcium.			
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.			
There has been no environmental impact because of the non-compliance. As sodium, potassium and calcium results are used as general indicators of water quality (not for comparison to a licence limit) the use of the local laboratory will not compromise the objectives of the sampling program.			
Cause (or suspected cause) of non-compliance:			
The local laboratory, Vintessential Laboratories, does not have NATA accreditation for analytical methods for sodium, potassium and calcium. Duplicate sampling and analysis at a Perth lab with NATA certified methods add a significant cost to the monitoring program. The samples would also require additional preservation and an extended holding time before analysis.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Vasse Felix will request a Note be added to Table 6 in the licence to allow non-NATA certified methods for sodium, potassium and calcium analysis.			
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 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 ¹ .			
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:	Chief Winemaker	Position:	CEO
Date:	27 July 2023	Date:	27 July 2023
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.