



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/ 07/2023 to 30/06/2024		

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	1,590 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	3,410 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:	1; Table 1 Item 5	Date(s) of non-compliance:	24/10/2023
Details of non-compliance:			
<p>Grey water from the on-site restaurant was re-directed to comply with the operational requirement 'as of 24 October 2023 the WWTP must only receive wastewater generated from alcoholic beverage manufacturing operations'. A dedicated septic tank and leach drain system was installed to receive the grey water. Soil and site assessments and approvals, from the Shire of Augusta Margaret River and the Department of Health, were required before installation. Due to a delay in receiving the approvals the diversion was completed on 20 November 2023 after the licence deadline of 24 October 2023.</p>			
<p>What was the actual (or suspected) environmental impact of the non-compliance?</p> <p>NOTE – 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 because of the delay. The intent of condition was to target installation prior to vintage to reduce the hydraulic load and biological oxygen demand (BOD) load to the WWTP. The system was fully operational prior to the vintage period (February to April).</p>			
Cause (or suspected cause) of non-compliance:			
<p>The time taken to receive the approvals was longer than anticipated, which delayed the installation.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>There were no adverse effects of the non-compliance so no further action is required.</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: 17/10/2023 and updated 30/11/2023	

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:	1; Table 1 Item 6	Date(s) of non-compliance:	6/2/2024 – 12/2/2024; 14/2/2024; 18/2/2024-19/2/2024.
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Details of non-compliance:

The licence limits daily discharge to each of the leach field areas to 14,500 L/day. The treated wastewater daily discharge volume exceeded 14,500 L/day in the east and west leach field on 10 days during vintage (1 February to 31 April). Daily hydraulic loading to each of the leach field areas was as follows:

Date	Discharge volume to each area (L/day)
6/02/2024	22,310
7/02/2024	21,735
8/02/2024	16,490
9/02/2024	17,765
10/02/2024	15,965
11/02/2024	16,720
12/02/2024	16,410
14/02/2024	14,745
18/02/2024	15,120
19/02/2024	14,775

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 evidence of impacts from the discharge. There is increased separation to groundwater in February 2024 which reduces the risk of treated wastewater coming into direct contact with groundwater. An inspection of the leach field on 22 February 2024 noted that the surface and surrounding area was very dry so there was no surface runoff. It was likely that the leach field had sufficient capacity for the additional hydraulic loading considering:

- It was the end of summer and there had been very low rainfall in the preceding months, so the soil profile was drier than usual.
- Treated wastewater discharge in the previous month was 7,967 L/day (monthly average), lower than the design capacity of 14,500 L/day.
- By the end of February hydraulic loading was much lower than the discharge limit with 3 days of no discharge; and
- In January 2024, drains in the west area of the leach field were replaced with an increase in capacity from 14,500 L/day to 16,200 L/day, which provides for additional hydraulic loading beyond the licence limit in this area.

Discharge was to L1 as depicted in the licence Schedule 1: Maps.

Cause (or suspected cause) of non-compliance:

In February 2024 there was a period of 3 consecutive weeks with very high temperatures. Peak temperatures were recorded on 1 February (38.7°C), 9 February (37.6°C), 15 February (38.9°C) and 19 February (40.2°C) (see also temperature graph below). Consecutive weeks of very hot weather resulted in an early and compressed period of grape harvesting and processing. This resulted in high volumes of wastewater being generated in a short time frame. The storage capacity at the WWTP was consumed and treated wastewater had to be discharged above the daily licence limit to avoid overflow of untreated wastewater.

Section E – Details of non-compliance with licence condition	
Wilyabrup Temperature (Daily) <small>11/ 02/2024 - 29/02/2024</small>	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
Additional wastewater storage capacity was installed in early 2023 when an 85kL tank was replaced with a 295kL tank. In a more typical year, it is expected that the WWTP storage capacity should be sufficient to operate within the hydraulic capacity of the leach field areas. Storage volumes will be closely monitored leading up to and during vintage in 2025 to reduce the risk of exceeding the licence limit.	
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: 28/02/2024

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:	29/2/2024
Details of non-compliance:			
A new treated wastewater discharge 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 February 2024 was 12,808 kg/ha/month.			
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 evidence of impacts from discharge of the treated wastewater. There is increased separation to groundwater in February which reduces the risk of wastewater discharge coming into direct contact with groundwater. An inspection of the leach field on 22 February 2024 noted that the surface and surrounding area was very dry so there was no risk of impacts to surface waters.			
Though the BOD load to the leach field in February 2024 was high, all other samples in 2023-2024 were below the licence limit. The Annual Environmental Report (AER) includes monthly BOD loads to the leach field (L1) during 2023-2024 and compares the results to historical data. The average BOD in 2023-2024 was 1,349 kg/ha/month, lower than the long-term average of 3,176 kg/ha/month. 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 in 2022.			
Discharge was to L1 as depicted in Schedule 1: Maps in the licence.			
Cause (or suspected cause) of non-compliance:			
Consecutive weeks of very hot weather resulted in an early and compressed period of grape harvesting and processing. This resulted in high volumes of wastewater being generated in a short time frame. The storage capacity at the WWTP was rapidly consumed which reduced the residence time in the aeration tanks before discharge. Aeration was increased in the WWTP in October 2023 with modifications to the venturi aerator but it was not sufficient to treat the BOD load in the short residence time.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
An additional floating aerator was installed on 29 February 2024 to increase aeration.			
In a more typical year, the WWTP storage capacity may be sufficient, in combination with the additional aeration, to adequately reduce the BOD load in the treated wastewater discharge.			
Was this non-compliance previously reported to DWER?			
<input checked="" type="checkbox"/> Yes			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 15/03/2024	

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:	30/6/2024
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 has requested 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 checked="" type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: : 28/7/2023 in 2022-2023 AER	

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 website.

Signature ² : 		Signature: 	
Name: (printed) 		Name: (printed) 	
Position:	Chief Winemaker	Position:	CEO
Date:	19.07.2024	Date:	29.07.2024
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.