



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:	L8262/2008/2	Licence file number:	F-AA-25324
Licence holder name:	Government of WA, Department of Justice		
Trading as:	Acacia Prison Woorooloo		
ACN:	25103389163		
Registered business address:	141 St Georges Tce Perth WA		
Reporting period:	01/01 / 2024 to 31/12/2024		
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	
54 Sewage Facility		152,466ML	

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

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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:	Table 2.2.2	Date(s) of noncompliance:	2023 in aggregate
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Details of non-compliance:

The total phosphorous loading in the greenspaces and the woodlots was 47.3 kg/ha where the licence specifies a limit of 50kg/ha. P levels in the recycled water were between 1.1 and 7.4mg/l, with a median value of 4.1mg/l, above the licence requirement of 3mg/l. This loading rate is 20% lower than 2021

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 noncompliance took place.

This excess loading of P compared to the licence has been consistent over the last 8 years, yet no change in available P over time has been observed or recorded in the soil test results.

This section of the licence is based on the document WQPN22 Irrigation with Nutrient Rich Wastewater using table 2, and needs to be considered in conjunction with note a. The parameters that are outlined in this table are the maximum application for certain irrigation parameters that do not align with the NIMP and as such should only be used as a guide, so this result is not a cause for concern. There has been no adverse impact to the environment from this P loading. Soil available P is unchanged.

Cause (or suspected cause) of non-compliance:

Testing of influent sewage has shown influent TP 15mg/l and 20mg/l i.e 1.5 to 2 x expected loads in high strength raw sewage. This has reduced significantly since 2021 (range 37-110mg/L)

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:

There are few options to remove more P. Sodium aluminate could be added prior to filtration, which will clog the filters. Alternatively, Sodium aluminate could be added directly to the dam as was previously done, but this will cause the captured P to settle into the bottom of the dam as a sludge and this would become a long-term problem. The P loadings have had no measurable impact on the soils, as has been previously reported to DWER. The soils of the area are bauxitic, which means there is almost total **adsorption**, leaving very little bio-available P. This soil chemistry means that almost any P that is applied is immediately immobilised. No action is required to reduce the levels of P.

Was this non-compliance previously reported to DWER?

X Yes, and

Reported to DWER verbally

Date: / /

X ☐ Reported to DWER in writing

Date: every AACR since 2015

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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) website.

Signature ² :		Signature:	
Name: (printed)		Name: (printed)	
Position:		Position:	
Date:	02/01/25	Date:	13/01/25
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.