



## 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:	L9429/2024/1	Licence file number:	DWERDT966067
Licence holder name:	George Weston Foods Limited		
Trading as:			
ACN:	008 429 632		
Registered business address:	7 - 11 Talavera Road North Ryde NSW 2113		
Reporting period:	27 / 06 / 2024 to 31 / 05 / 2025		

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
655,200 tonnes per annual period	409,100.629

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
N/A	N/A

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:	6	Date(s) of non-compliance:	27/06/2024 – 31/05/2025
<b>Details of non-compliance:</b>			
No emissions monitoring of the three cyclone cooler stacks was undertaken during the 2024–2025 reporting period. Therefore, it is not known if the total particulate matter emissions value exceeded the limit of 50 mg/m <sup>3</sup> during the 2024–2025 reporting period. The condition was rated as non-compliant due to the absence of data, rather than a confirmed exceedance of the discharge limit.			
<b>What was the actual (or suspected) environmental impact of the non-compliance?</b>			
<b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
<p>The non-compliance relates to an absence of data, rather than a confirmed exceedance of the discharge limit. It is therefore considered likely that there were no actual (or suspected) environmental impacts of this non-compliance, which is supported by the following:</p> <ul style="list-style-type: none"> <li>• The 2024–2025 production capacity (411,901 tonnes) was less than the maximum assessed production capacity of (655,200 tonnes) per annual period</li> <li>• Emissions monitoring was undertaken during the time limited operations phase (from November 2023 to June 2024), where the combined detected values of total particulate matter from the three cyclone cooler stacks did not exceed the limit of 50 mg/m<sup>3</sup> (41.7 mg/m<sup>3</sup> in November 2023 and 36.9 mg/m<sup>3</sup> in January 2024; Ektimo 2024)<sup>1</sup>.</li> <li>• The average daily production output during the time limited operations phase (1,055 tonnes/day) was slightly lower than the average daily production output during the 2024–2025 reporting period (1,240 tonnes/day). The lower volume was due to GWF producing animal food at both Hope Valley and Bentley feed mills. The increase in production would slightly increase the stack emission output, but it would be related to tonnes per hour produced spread across three lines so the relationship will not be linear (personal communication, G. Friedrichs, 23 June 2025).</li> <li>• Considering the previous monitoring results, it is possible that emissions during the 2024–2025 reporting period were under the discharge limit of 50 mg/m<sup>3</sup> and is therefore unlikely any actual (or suspected) environmental impacts were realised.</li> </ul>			
<b>Cause (or suspected cause) of non-compliance:</b>			
<p>The three stacks (the authorised discharge location for emitting point source emissions to air) are located on the highest level of the feed mill, as indicated in Figure 1. The stacks were replaced in December 2024 as a result of identified corrosion, which ultimately presented a safety risk for the feed mill. This action was in line with the licence condition 1, which requires the licence holder (GWF) to ensure that site infrastructure and equipment (stacks) are maintained.</p> <p>Emissions monitoring was scheduled to be undertaken by independent consultant Ektimo on 13 May, during the 2024–2025 reporting period, however, Ektimo found that the sampling ports on the new stacks were classified as 'non-conforming' in accordance with AS 4323.1 (2021) Method 1: Selection of sampling positions and measurement of velocity in stacks.</p> <p>The stack replacement ultimately contributed to the non-compliance with this condition, as the emissions monitoring scheduled on 13 May 2025 was unable to be undertaken due to 'non-conforming' sampling ports. Emissions monitoring could not be undertaken for the remainder of the 2024–2025 reporting period as the sampling ports were not relocated prior to 31 May 2025.</p> <p>Therefore, emissions monitoring of the stacks was not undertaken during the 2024–2025 reporting period and it is not known if the particulate matter emissions value exceeded the limit of 50 mg/m<sup>3</sup>.</p>			

<sup>1</sup> Ektimo. 2024. George Weston Foods (GWF) Emissions Testing Works Approval Testing. Report prepared for George Weston Foods.

**Section E – Details of non-compliance with licence condition**



**Plate 1: Original three stacks observed during time limited operations phase (13 December 2023)**

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

Despite the observed corrosion, the stacks remained functional and worked in line with the licence condition 1 operational requirements. In December 2024, the feed mill paused operations while the original three stacks were removed, and new stacks were installed. No point source emissions were generated by the feed mill operations at this time; therefore, no emissions were discharged to air during the stack replacement. Emissions monitoring is expected to be undertaken as close as possible to the preceding 2024–2025 reporting period (early in the 2025–2026 reporting period) once the sampling ports have been relocated and weather permitting.

**Was this non-compliance previously reported to DWER?**

Yes, and

Reported to DWER verbally

Date: 24 / 06 / 2025

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:	7	Date(s) of non-compliance:	27/06/2024 – 31/05/2025
Details of non-compliance:			
Emissions monitoring of the stacks was not undertaken during the 2024–2025 reporting period.			
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.			
It is considered likely that there were no actual (or suspected) environmental impacts of this non-compliance, which is supported by the following:			
<ul style="list-style-type: none"> <li>• The 2024–2025 production capacity (411,901 tonnes) was less than the maximum assessed production capacity of (655,200 tonnes) per annual period</li> <li>• Emissions monitoring was undertaken during the time limited operations phase (from November 2023 to June 2024), where the combined detected values of total particulate matter from the three cyclone cooler stacks did not exceed the limit of 50 mg/m<sup>3</sup> (41.7 mg/m<sup>3</sup> in November 2023 and 36.9 mg/m<sup>3</sup> in January 2024; Ektimo 2024)<sup>2</sup>.</li> <li>• The average daily production output during the time limited operations phase (1,055 tonnes/day) was slightly lower than the average daily production output during the 2024–2025 reporting period (1,240 tonnes/day). The lower volume was due to GWF producing animal food at both Hope Valley and Bentley feed mills. The increase in production would slightly increase the stack emission output, but it would be related to tonnes per hour produced spread across three lines so the relationship will not be linear (personal communication, G. Friedrichs, 23 June 2025).</li> <li>• Considering the previous monitoring results, it is possible that emissions during the 2024–2025 reporting period were under the discharge limit of 50 mg/m<sup>3</sup> and is therefore unlikely any actual (or suspected) environmental impacts were realised.</li> </ul>			
Cause (or suspected cause) of non-compliance:			
<p>The three stacks (the authorised discharge location for emitting point source emissions to air) are located on the highest level of the feed mill, as indicated in Figure 1. The stacks were replaced in December 2024 as a result of identified corrosion, which ultimately presented a safety risk for the feed mill. This action was in line with the licence condition 1, which requires the licence holder (GWF) to ensure that site infrastructure and equipment (stacks) are maintained.</p> <p>Emissions monitoring was scheduled to be undertaken by independent consultant Ektimo on 13 May, during the 2024–2025 reporting period, however, Ektimo found that the sampling ports on the new stacks were classified as 'non-conforming' in accordance with AS 4323.1 (2021) Method 1: Selection of sampling positions and measurement of velocity in stacks. The monitoring method must comply with AS 4323.1 to comply with the licence L9429/2024/1 condition 7.</p> <p>The stack replacement ultimately contributed to the non-compliance with this condition, as the emissions monitoring scheduled on 13 May 2025 was unable to be undertaken due to 'non-conforming' sampling ports. Emissions monitoring could not be undertaken for the remainder of the 2024–2025 reporting period as the sampling ports were not relocated prior to 31 May 2025.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			

<sup>2</sup> Ektimo. 2024. George Weston Foods (GWF) Emissions Testing Works Approval Testing. Report prepared for George Weston Foods.

**Section E – Details of non-compliance with licence condition**

In December 2024, the feed mill paused operations while the original three stacks were removed, and new stacks were installed. Emissions monitoring is expected to be undertaken as close as possible to the preceding 2024–2025 reporting period (early in the 2025–2026 reporting period) once the sampling ports have been relocated and weather permitting.

Was this non-compliance previously reported to DWER?

Yes, and

Reported to DWER verbally

Date: 24 / 06 / 2025

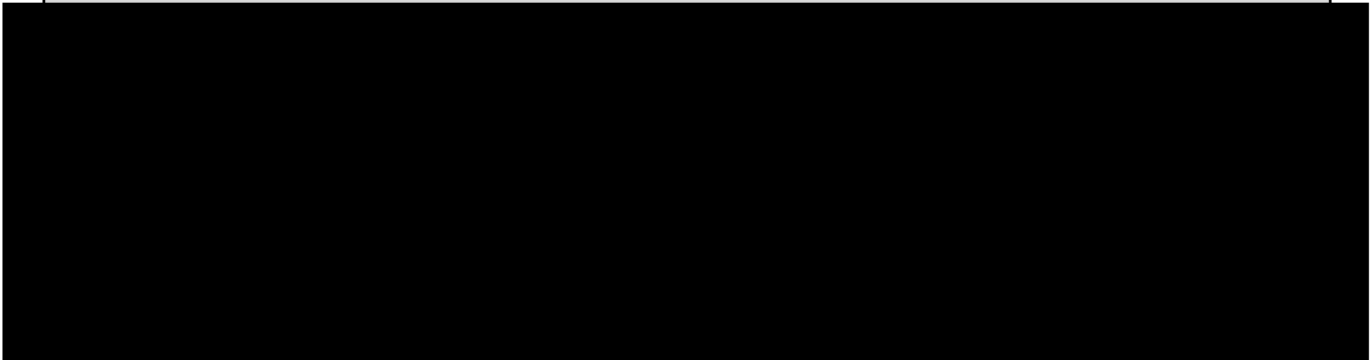
Reported to DWER in writing

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.



Date:	30/06/2025	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.