



## 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:	L6001/1989/15	Licence file number:	2013/003631
Licence holder name:	V & V Walsh Pty Ltd		
Trading as:	V&V Walsh Meat Processors and Exporters		
ACN:	100 834 455		
Registered business address:	235 St Georges Terrace PERTH WA 6000		
Reporting period:	01/01/2023 to 31/12/2023		

### 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
Category 15: Abattoir: premises on which animals are slaughtered.	43,841 Tonnes (see attachment Annex A)
Category 16: Rendering operations: premises on which substances from animal material are processed or extracted.	9,280 Tonnes (see attachment Annex A)
Category 55: Livestock saleyard or holding pen: premises on which live animals are held, pending their sale, shipment or slaughter.	128,826 (see attachment Annex A)

**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
Category 83: Fellmongering: premises on which animal skins or hides are dried, cured or stored.	372,594 Skins (see attachment Annex A)

**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
NA	NA

**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:	11	Date(s) of non-compliance:	October/November/December 2023
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Details of non-compliance:

Exceedance of annual “Total Nitrogen” emission to land limit of 600kg/annual period for irrigation area L1.

“Total Nitrogen” emissions to land for irrigation area L1 over 2023 annual period at December = 942.42 kg/ha

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.

No identified environmental impact due to non-compliance. Map of irrigation area is shown in Attachment Annex B.

Cause (or suspected cause) of non-compliance:

Underperforming nitrification and denitrification of treatment ponds 2, 3 and 4. This is due to

- Undersized aeration technology for pond 3
- Accumulation of pond sludge reducing hydraulic retention time, reducing treatment efficiency.
- Reduced water usage throughout the facility per tonne of product processed resulting in increasing nutrient concentration per liter of effluent produced, increasing stress placed on wastewater treatment plant.

Greater volumes of water was required for spring and summer turf irrigation due to hot weather, leading to higher loading of nutrients to land.

Section E – Details of non-compliance with licence condition	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<p>Treatment additives to reduce sludge and nutrient concentration have been purchased, scheduled to commence treatment in February 2024.</p> <p>Additional nitrification/denitrification aeration technology purchased and due for instillation in February 2024 to aid in reducing nitrogen in final effluent.</p> <p>Desludging has been planned for wastewater treatment assets to increase pond volumes and hydraulic retention time, maximising water treatment time and reduce risk of nutrient leaching into wastewater post treatment. Currently waiting to receive quotes and suitable time frames for works from contactors.</p> <p>Front end engineering concept designs of a new WWTP to reduce nutrient concentration in final effluent has been completed and will be further assessed in 2024.</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: 24/01/2023

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:	11	Date(s) of non-compliance:	September/ December 2023
Details of non-compliance:			
<p>Exceedance of annual “Total Nitrogen” emission to land limit of 180kg/annual period for irrigation area L2.</p> <p>“Total Nitrogen” emissions to land for irrigation area L2 over 2023 annual period at September = 317kg/ha, at December = 326.47kg/ha.</p>			
What was the actual (or suspected) environmental impact of the non-compliance?			
<p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			

Section E – Details of non-compliance with licence condition	
No identified environmental impact due to non-compliance. Map of irrigation area is shown in Attachment Annex B.	
Cause (or suspected cause) of non-compliance:	
<p>Underperforming nitrification and denitrification of treatment ponds 2, 3 and 4. This is due to</p> <ul style="list-style-type: none"> <li>• Undersized aeration technology for pond 3</li> <li>• Accumulation of pond sludge reducing hydraulic retention time, reducing treatment efficiency.</li> <li>• Reduced water usage throughout the facility per tonne of product processed resulting in increasing nutrient concentration per liter of effluent produced, increasing stress placed on wastewater treatment plant.</li> <li>• Inability to irrigate to irrigation area L4 due to early precipitation events and pooling of storm water in area.</li> </ul>	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<p>Treatment additives to reduce sludge and nutrient concentration have been purchased, scheduled to commence treatment in February 2024.</p> <p>Additional nitrification/denitrification aeration technology purchased and due for installation in February 2024 to aid in reducing nitrogen in final effluent.</p> <p>Desludging has been planned for wastewater treatment assets to increase pond volumes and hydraulic retention time, maximising water treatment time and reduce risk of nutrient leaching into wastewater post treatment. Currently waiting to receive quotes and suitable time frames for works from contactors.</p> <p>Front end engineering concept designs of a new WWTP to reduce nutrient concentration in final effluent has been completed and will be further assessed in 2024.</p> <p>Water saving technologies will continue to be installed to reduce volume of effluent required to be irrigated.</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: 24/01/2023
Section E – Details of non-compliance with licence condition	

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:	11	Date(s) of non-compliance:	September/December 2023
Details of non-compliance:			
Exceedance of annual “Total Inorganic Nitrogen” emission to land limit of 180kg/annual period for irrigation area L3.			
“Total Inorganic Nitrogen” emissions to land for irrigation area L3 over 2023 annual period at September = 488kg/ha, at December = 493.67kg/ha.			
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.			
No identified environmental impact due to non-compliance. Map of irrigation area is shown in Attachment Annex B.			
Cause (or suspected cause) of non-compliance:			
<p>Underperforming nitrification and denitrification of treatment ponds 2, 3 and 4. This is due to</p> <ul style="list-style-type: none"> <li>• Undersized aeration technology for pond 3</li> <li>• Accumulation of pond sludge reducing hydraulic retention time, reducing treatment efficiency.</li> <li>• Reduced water usage throughout the facility per tonne of product processed resulting in increasing nutrient concentration per liter of effluent produced, increasing stress placed on wastewater treatment plant.</li> <li>• Inability to irrigate to irrigation area L4 due to early precipitation events and pooling of storm water in area.</li> </ul>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Treatment additives to reduce sludge and nutrient concentration have been purchased, scheduled to commence treatment in February 2024.</p> <p>Additional nitrification/denitrification aeration technology purchased and due for installation in February 2024 to aid in reducing nitrogen in final effluent.</p> <p>Desludging has been planned for wastewater treatment assets to increase pond volumes and hydraulic retention time, maximising water treatment time and reduce risk of nutrient leaching into wastewater post treatment. Currently waiting to receive quotes and suitable time frames for works from contactors.</p> <p>Front end engineering concept designs of a new WWTP to reduce nutrient concentration in final effluent has been completed and will be further assessed in 2024.</p>			

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

Water saving technologies will continue to be installed to reduce volume of effluent required to be irrigated.

Was this non-compliance previously reported to DWER?

Yes, and

Reported to DWER verbally

Date: / /

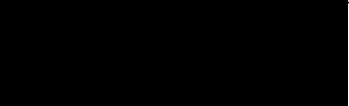

Reported to DWER in writing

Date: 24/01/2023

**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.

Signature <sup>2</sup> :		Signature:	
Name: (printed)		Name: (printed)	
Position:	CFO	Position:	
Date:	29 Jan 2024	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.