



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:	L7413/1998/10	Licence file number:	DER6284/1
Licence holder name:	Cretta Pty Ltd		
Trading as:	Howard Park Wines		
ACN:	008 870 166		
Registered business address:	35 Hay Street Subiaco WA 6008		
Reporting period:	01/ 07/2024 to 30/06/2025		

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">• section C;• section D (if required); and• sign the declaration in Section F.
<input checked="" type="checkbox"/> No – please complete: <ul style="list-style-type: none">• 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	3,629 kilolitres (see AER for supporting doc)

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	4,603 kilolitres (see AER for supporting doc)

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:	1/5/2025
Details of non-compliance:			
<p>Stabilised organic waste (compost) was spread on vineyards in areas that were within 50m of the 'premises boundary' and beyond the premise boundary onto land owned by HPW. Compost was not applied within 50m of defined watercourses or wetlands.</p> <p>The new licence issued 25 February 2025 uses the terminology 'premises boundary' which is different to the previous licence which referred to 'external property boundary'. HPW has historically understood that compost could be applied to HPW property beyond the premises boundary. We believe the intent is not to restrict compost application along boundaries where the adjacent land is owned by HPW.</p>			
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. HPW applies stabilised organic waste (compost) on the vineyard to improve soil and reduce the use of more nutrient-mobile inorganic fertilisers. The compost is applied when the soil is moist but not waterlogged to optimise soil improvement and reduce the risk of nutrient runoff.			
Cause (or suspected cause) of non-compliance:			
The non-compliance is considered to be administrative with the wording in the licence unintentionally limiting compost applications to areas where it can be applied with no impact to the environment.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
A licence amendment will be sought to change the wording in this condition.			
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 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, Table 2: Timeframe	Date(s) of non-compliance:	21 May 2025
Details of non-compliance:			
<p>Installation of three new monitoring bores was required by 21 May 2025 (no later than 90 days from the date of issue of the licence (20 February 2025)).</p> <p>Bores were installed on 13/8/2025, approximately 3 months after the due date.</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>There was no environmental impact. The groundwater bores were installed on 13 August 2025, and monitoring commenced as soon as the bores were developed so there is only one sample that has been missed (June 2025). As it will take some time to develop a data set to assess trends in water quality, one missed sample does not pose an environmental risk.</p>			
Cause (or suspected cause) of non-compliance:			
<p>HPW initially sought quotes from drilling companies to install the wells which took some time. It then became apparent that the drillers did not have the expertise to complete all the detailed requirements outlined in licence Table 2. Specifically, describing and classifying soil in accordance with Australian Standard Geotechnical Site Investigations AS1726 and demonstrating compliance ASTM D5092/D5092M-16. Due to high consultant workloads, it took additional time to scope and quote the groundwater bore installation. Further delays were experienced trying to schedule a date that suited both the driller and the consultant.</p>			
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,			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input checked="" type="checkbox"/> Reported to DWER in writing		Date: 13/8/2025	

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:	5, Table 3: EC, SAR:EC	Date(s) of non-compliance:	20/3/2025, 1/5/2025, 29/5/2025
Details of non-compliance:			
<p>New discharge limits for electrical conductivity (EC) and sodium adsorption: electrical conductivity ratio (SAR:EC) were added to the licence 25 February 2025. Wastewater samples collected on 20/3/2025, 1/5/2025 and 29/5/2025 recorded EC results of 3.1, 2.9 and 3.5dS/m respectively compared to the limit of 2.9dS/m. The sample collected on 20/3/2025 also recorded a SAR:EC ratio which was outside the stable soil structure range depicted in Schedule 2 of the licence. Though not required by the licence, SAR was analysed in monthly samples from April through to June and the SAR:EC ratio was outside the stable soil structure range in all samples.</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><u>Electrical conductivity (EC)</u> There has been no environmental impact identified from the higher EC. The EC results are typically below 2.9dS/m. The discharge limit of 2.9dS/m is to be used as a general guide (ANZG 2023). EC of the saturated soil solution (EC_{se}) can be calculated to better assess salinity risks. The tree lot is planted with <i>Eucalyptus globulus</i>, which has a low to moderate salt tolerance; reduced growth is expected at an EC_{se} of 5dS/m with further reduction in growth and reduced survival at 5-10dS/m (Marcar et al., 1995). Research indicates a combination of soil salinity and waterlogging could cause a reduction in growth at and EC_{se} of 2.5dS/m (Bennett and George, 1995). All (EC_{se}) results are less than the 5dS/m threshold. Given that the calculated EC_{se} results are less than 5 dS/m, and the hydraulic loading is being managed to minimise the risk of waterlogging, the risk of reduced growth is likely to be low. This is supported by the long-term soil monitoring which shows the actual EC_{se} (calculated* from EC_{1:5}) of all soil samples ranged from 0.48dS/m to 3.6dS/m* (average 1.47dS/m) over the last ten years (See AER).</p> <p><u>Sodium adsorption ratio:electrical conductivity ratio (SAR:EC ratio)</u> Soil monitoring results summarised in the AER do not indicate any soil parameters of concern.</p>			
Cause (or suspected cause) of non-compliance:			
<p>Dissolved solids in wastewater contribute to the high EC in wastewater. High EC can occur during peak operational activities. High SAR is the result of a higher proportion of sodium concentrations in the wastewater compared to calcium and magnesium. .</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p><u>EC</u> - chemical use will be re-visited to determine if there are opportunities to reduce or change products that may increase EC in wastewater. <u>SAR</u> - given that the ANZG do not recommend the depicted SAR:EC relationship as an absolute guide for irrigation water, HPW will seek a licence amendment to remove it as a licence limit and request that it be used as a management tool. There is already a condition in place for the application of gypsum to manage soils that may disperse clays in some areas on site. A variation on this condition that only requires application of gypsum subject to water quality 'outside the stable soil structure range' in these areas. This approach will also provide the opportunity for improvements in wastewater quality at the source rather than soil amendment after discharge.</p>			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			

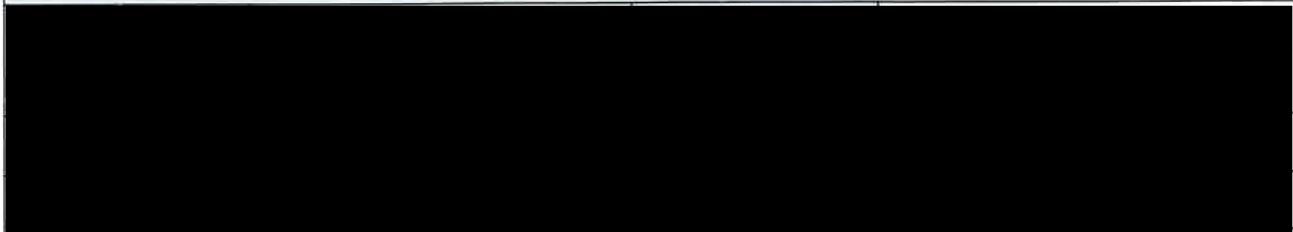
Section E – Details of non-compliance with licence condition	
<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input type="checkbox"/> Reported to DWER in writing	Date:

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:	16	Date(s) of non-compliance:	20/3/2025, 1/5/2025, 29/5/2025
Details of non-compliance:			
Non-compliance with limits for EC and SAR:EC ratio was not reported to the CEO of the DWER within 48 hours as required by licence condition 16.			
EC and SAR:EC ratio are new limits added to the licence in February 2025 and the requirement to report exceedances was overlooked. The reporting requirement was identified in late August 2025 during collation of the Annual Environmental Report.			
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. This non-compliance is related to missed notifications. Information about exceedances is provided in the non-compliance report for condition 5.			
Cause (or suspected cause) of non-compliance:			
As the limits were new there was oversight that exceedances need to be reported.			
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. Procedures will be updated to ensure compliance with the licence in future (September 2025 onwards).			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes,			
<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 particular¹.

I / We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation’s (DWER) website.



Date:	29.08.25	Date:	29.08.25
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.