



## 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:	L8031/2005/4	Licence file number:	DER2014/002999-3 (FA243653)
Licence holder name:	Milne Agrigroup Pty Ltd		
Trading as:	Mount Barker Chicken		
ACN:	008 919 579		
Registered business address:	2 Alumina Road EAST ROCKINGHAM WA 6168		
Reporting period:	1 / 7 / 24 to 30 / 6 / 25		

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
Category 15	19,848 tonnes

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
Category 15 (Irrigation)	52,389 kL

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:	1.3	Date(s) of non-compliance:	June 2025
Details of non-compliance:			
Total production throughput exceeded the limit of 17,500 tonnes set in Condition 1.3 with a total of throughput of 19,848 tonnes (13% over licence throughput limit).			
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.			
Minimal – while the high production volume generated a marginal increase in the wastewater volume discharged to the treatment ponds, nutrient loadings to the irrigation area remained well below the licence limits at all material times.			
Cause (or suspected cause) of non-compliance:			
The exceedance was due to an unexpected increase in the average bird weight being sent to the Kendenup operation for processing due to changes in contractual arrangements.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
MBC has submitted an application to DWER to increase throughput capacity at the Kendenup site, including upgrades to wastewater treatment and irrigation. In this application MBC has committed to using best endeavors to move slaughter operations from the Kendenup site within 5 years.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and No			
<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:	1.3	Date(s) of non-compliance:	June 2025
Details of non-compliance:			
Total irrigation volume exceeded the limit of 51.2ML set in Condition 2.1.2 with a total of 52.4 ML irrigated (2.3% over licence volume limit)			
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.			
Minimal –nutrient loading limits to the irrigation area remained well within license limits at all material times.  The new NIMP (EEI, 2025) indicates groundwater levels were unlikely to be affected, and transport of contaminants to groundwater was unlikely to occur, even under a scenario involving 85ML of wastewater per annum.			
Cause (or suspected cause) of non-compliance:			
The higher volume of water was likely to be a result of an increase in production throughput.  Additional washdowns to achieve required microbial loadings also likely increased water usage at the site. The new equipment to be installed as part of the upgrade is expected to significantly improve microbial management and reduce total water per bird.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
License amendment submitted detailing improvements in wastewater management and irrigation.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and No			
<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:	3.4.1	Date(s) of non-compliance:	September 24
Details of non-compliance:			
Soil sampling was undertaken in May 2025 rather than in September 2024 as specified in the licence. kSat was not provided for the soil sampling locations S2, S5 and S6			
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.			
Nil			
Cause (or suspected cause) of non-compliance:			
Late sampling was a result of changes of staff resulting in an oversight to undertake the sampling in the correct time period. Sampling was undertaken as soon as the company became aware of the requirement. A highly detailed soil analysis was undertaken by consultants to support the submitted license amendment application, but the requirement to measure kSat was not properly communicated. The consultant used a different set of measurements.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Processes have been implemented and an environmental monitoring schedule established to ensure all monitoring occurs at required times.			
As detailed in the license amendment application, an external consultant will be engaged to oversee monthly wastewater performance following the upgrade. This should ensure monitoring is performed as required.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and No			
<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:	3.4.1	Date(s) of non-compliance:	September and December 24, March and June 25
Details of non-compliance:			
Groundwater sampling was not undertaken in the months specified in the licence. Groundwater samples were not collected from all bores. Bores not included in the sampling are: <ul style="list-style-type: none"> <li>• Sept 24 – MW17</li> <li>• Dec 25 – MW15, MW17</li> <li>• Mar 25 – MW5, MW15 and MW17</li> <li>• June 25 – MW17</li> </ul>			
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.			
Nil.  Note that the overwhelming majority of samples were successfully taken and results did not detect any significant negative environmental impacts.			
Cause (or suspected cause) of non-compliance:			
Late samples were the result of staffing issues, and omissions of particular bores is due to the bores being dry and/or safe access to the bore limited during these events.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
No action is possible for bores which are periodically dry.  Maintenance is undertaken periodically to repair damaged bores and any compromised bore access that may occur from time to time.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and No			
<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:	2.1	Date(s) of non-compliance:	December 24
Details of non-compliance:			
pH of the irrigation water (SW3) exceeded the licence limit of 8.5 recording a level of 8.8.			
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.			
Nil – all other samples registered less than 8.5,  Furthermore, the natural soil pH of the area is relatively acidic, and the application of alkaline irrigation water is potentially beneficial to the soil pH to bring toward the ideal neutral range. pH of the soil is still acidic in all samples indicating the no negative impacts have resulted from the alkaline wastewater application.			
Cause (or suspected cause) of non-compliance:			
Alkalinity can be formed as a by-product of denitrification in the wastewater treatment process. This can result in an increased pH in the wastewater.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Ongoing monitoring will continue of the irrigation water and the soil to detect any elevation of the soil pH above 7.5 which could indicate that excess alkalinity was being applied.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and No			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	

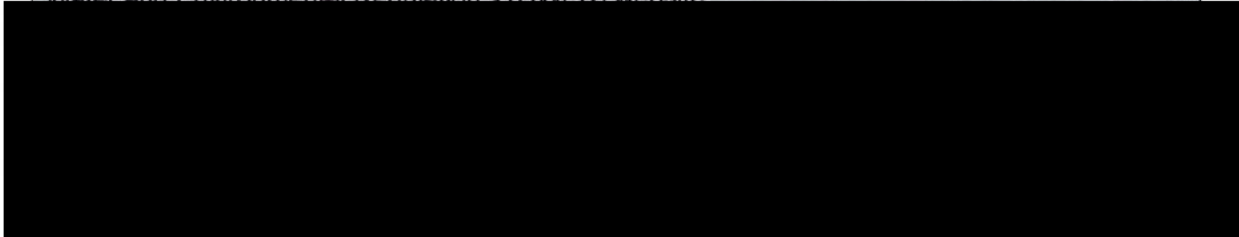
Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:	4.1.1 IR11	Date(s) of non-compliance:	2024-25
Details of non-compliance:			
The piezometers used to measure soil moisture ceased functioning and are pending replacement.			
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.			
Nil.			
Cause (or suspected cause) of non-compliance:			
Degradation of electronics in the devices.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
As detailed in the license amendment application APP-0030280, MAG proposes installing a new series of networked wireless devices that will provide continuous data to software on the office computer, thereby providing management with much improved data (as compared to the manually read piezometers) upon which to manage irrigation and report compliance.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and No			
<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:	4.1.1 IR14	Date(s) of non-compliance:	2024-25
Details of non-compliance:			
The Licence Holder has not provided an updated management plan (NIMP) for the irrigation of nutrient and salt rich wastewater using the Environmental Guidelines: Use of Effluent by Irrigation NSW DEC, 2004 as a guiding document.			
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.			
Nil.			
Cause (or suspected cause) of non-compliance:			
The previously approved NIMP has been used and reported against annually. Following the 2019 license amendment, efforts were made to update the NIMP but inconsistencies between the NSW document and WA conditions were difficult to reconcile. Some verbal discussions on this were held with DWER at the time. It was management’s understanding that the previous NIMP could be used, and as no further request was made by DWER for a new NIMP since 2020, this was assumed to be compliant.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
A new NIMP is proposed as part of the license amendment request currently with DWER, which would supersede any NIMP of the current license. Management has requested a stay of developing a new NIMP under the existing license until DWER make a determination on the amendment.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and No			
<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 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:	9/12/2025	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.