



## Appendix 1. Annual Audit Compliance Report Form

### Annual Audit Compliance Report Form

*Environmental Protection Act 1986, Part V*

Section A – Licence Details			
Licence number:	L8235/2008/2	Licence file number:	DER2014/001474
Licence holder:	Ian and Jemima Minty		
Trading as:			
ACN:			
Registered address:	Lot 4 Midlands Road Moora WA 6510		
Reporting period:	01 / 07 / 2020 to 30 / 06 / 2021		

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 at 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
61A	20,617 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
61A	0

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:	1.2.4	Date(s) of non-compliance:	6/03/21
Details of non-compliance:			
28 days' notice was not provided to the CEO prior to biosolids application. The non-compliance occurred when 123 tonnes of biosolids cake was applied to NA3-House paddock this paddock did not have a current approved REF.			
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> <p>The expectation is that there will be no noticeable effect from the unapproved land application of biosolids at NA3 House (figure 1). The risk of any enduring impact is also deemed to be low based on soil types, and characteristically moderate phosphorus retention index, quantity of material delivered and adherence to constraint buffers.</p> <p>NA3 has previously received two biosolids allocations from The Water Corporation, the first being in 2012 where 4587 tonnes of Lime Amended Biosolids (LAB) was applied at 15 dry t/ha. The second occasion occurred during 2016 where 1990 tonnes of LAB was applied at a rate of 21 dry t/ha and 3034 tonnes of biosolids cake was applied at a rate of 9 dry t/ha.</p> <p>All soil sampling and application rate calculations at the Narrabie property to date have returned an approved application rate of 9 dry tonnes per hectare for biosolids Cake. NA3 paddock was sampled on the 11/03/21 in response to the non-compliant application, results from the soil sampling confirmed that the biosolids was Nitrogen limited with an NLBAR of 9 dry t/ha and CLBAR 97.5 dry t/ha. As cake delivered to NA3 House (approx. 123 wet tonnes) was spread</p>			

across approximately 2.6ha, the actual application rate was calculated to be 9 dry tonnes per hectare at 18.8% total solids. Therefore, the NLBAR application rate has not been exceeded.

There are two types of constraint buffers at NA3 house (animal enclosure and remnant vegetation) which were confirmed as being in place after an inspection post application.

Figure 1: NA3 House Paddock



**Cause (or suspected cause) of non-compliance:**

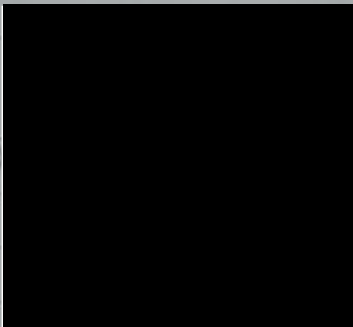
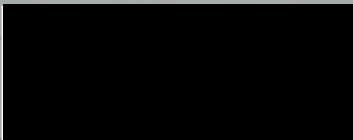
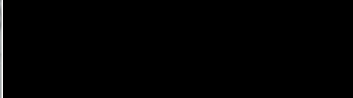
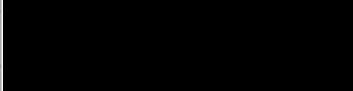
Biosolids Cake was delivered to NA3 paddock after heavy rainfall reduced accessibility to other approved paddocks on the farm. These paddocks were too boggy on the 6<sup>th</sup> of March, so a decision was made to deliver to NA3 paddock which had much firmer access. The premise of this solution was to deliver to NA3 but then transfer and spread the biosolids in NA11-Shed paddock which was located directly opposite NA3.

Poor communication between the Farmer (licensee) and the machinery operator resulted in the application of biosolids on NA3 an unapproved paddock.

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<ul style="list-style-type: none"> <li>• The Water Corporation have re-enforced the importance of full compliance and the risks related to not adhering with regulatory requirements.</li> <li>• The Water Corporation provides an 'Allocation Kick-off Pack' which includes a copy of all paddock REFs, including buffers.</li> <li>• The licensee has committed to ensuring operators are better supervised and informed, including a briefing on the contents of the Allocation Kick-off Pack.</li> <li>• Inspected the application area to confirm no adverse effect on any sensitive receptors</li> <li>• Soil sampling was conducted in the paddock in the 11/03/21, 1-week post application to enable calculation of NLBAR and CLBAR.</li> <li>• Soil sampling results were used to create an up to date REF that was submitted to DoH for approval, approval was granted by DoH on the 21/05/21. A copy of this REF has been submitted to DWER.</li> </ul>	
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 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. I/We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation's (DWER) website.

Signature <sup>1</sup> :		Signature:	
Name: (printed)		Name: (printed)	
Position:		Position:	
Date:		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.

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