

ANNUAL RETURN

Information on this form is required in accordance with the conditions of your licence issued under the *Waste Management and Pollution Control Act 1998*

Failure to provide the information requested and/or the provision of false or misleading information is an offence under the legislation and you may be liable for heavy penalties.

Section 1. Licence Details

LICENCE NUMBER	EPL 320	REPORTING PERIOD	1 May 2024 – 30 April 2025
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Please check your contact details including 24-hour emergency contact in [NT EPA online](#) and update if necessary. The NT EPA website will be updated using the details provided online.

Were the contact details correct? **YES** / NO

Section 2. Statement of Compliance

Were all conditions of the licence complied with during the reporting period? YES / **NO**

If yes, proceed to Section 4. If not, complete the table below (add more rows if required)

Details of Non-compliance				
Condition number	Date of non-compliance (dd/mm/yy)	Was NT EPA notified? (Yes / No)	If yes, date NT EPA notified (dd/mm/yy)	If yes, how was NT EPA notified? (e.g. phone, email, Pollution Hotline)
		If no, complete Section 3		
41 Monitoring Site: SW01, SW02, SW03. SW04, SW05	1/11/2024	NO		
41 Monitoring Site: SW01, SW02, SW03. SW04, SW05	31/01/2025	NO		
41 Monitoring Site: SW01, SW02, SW03. SW04	7/04/2025	NO		
41 Monitoring Site: GW4, GW5, GW7, Irrigation Plantation, Parameters: Total Coliforms, Enterococci	2/05/2025	NO		
41 Monitoring Site: GW4, GW5, GW7	17/10/2024	NO		

41 Monitoring Site: GW4, GW5, GW7	29/01/2025	NO		
41 Monitoring Site: GW4, GW5, GW7	23/04/2025	NO		
41 Monitoring Site: Irrigation Plantation, Irrigation Pivot, GW 1 (Bore 4), GW 2 (Bore 10) Parameters: Total Coliforms, Enterococci, E. coli, TP, TN	15/05/2025	NO		
41 Monitoring Site: Irrigation Plantation, Irrigation Pivot, GW1 (Bore 4), GW2 (Bore 10), GW3 (Bore 2), SW05 Parameters: Total Coliforms, E. coli, Enterococci, TN, TP	12/06/2024	NO		
41 Monitoring Site: Irrigation Plantation, GW2 (Bore 10), GW3 (Bore 2) Parameters: Total Coliforms, E. coli, Enterococci, pH	15/08/2024	NO		
41 Monitoring Site: GW4, GW5, GW7, Irrigation plantation, Irrigation pivot, GW2 (Bore 10), GW3 (Bore 2) Parameters: pH, E. coli, Total coliforms, Enterococci	17/10/2024	NO		
41 Monitoring Site: Irrigation plantation, GW1 (Bore 4), GW2 (Bore 10), GW3 (Bore 5) Parameters: pH, Total coliforms, TN, TP, E. coli	13/11/2024	NO		
41 Monitoring Site:	16/12/2024	NO		

Irrigation plantation, Irrigation Pivot, GW1 (Bore 4), GW2 (Bore 10), GW3 (Bore 2) Parameters: Total coliforms, TN, E. coli, Enterococci				
41 Monitoring Site: Irrigation plantation, GW4, GW5, GW7, Irrigation plantation, Irrigation Pivot, GW1 (Bore 4), GW2 (Bore 10), GW3 (Bore 2) Parameters: Total coliforms, E. coli, Enterococci, TN, TP	29/01/2025	NO		
41 Monitoring Site: SS1, SS2, SS3, SS4, SS5, SS6, SS7, SS8, SS9, SS10 Parameters: Total coliforms, E. coli, Enterococci, TP, TN, pH, EC	3/02/2025	NO		
41 Monitoring Site: Irrigation plantation, Irrigation Pivot, GW1 (Bore 4), GW2 (Bore 10), GW3 (Bore 2) Parameters: Total coliforms, Enterococci, TP, TN, pH	19/02/2025	NO		
41 Monitoring Site: Irrigation plantation, Irrigation Pivot, GW2 (Bore 10), GW3 (Bore 2), SW05 Parameters: Total coliforms, E. coli, Enterococci, TP, TN	27/03/2025	NO		
41 Monitoring Site: GW4, GW5, GW7, Irrigation plantation, Irrigation Pivot, GW1 (Bore 4), GW2 (Bore 10), GW3 (Bore 2), SW05 Parameters:	23/04/2025	NO		

Total coliforms, Enterococci, pH, TN, TP, E. coli				
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Section 3. Report of Non-compliance

Please supply the following details for each non-compliance not reported to the NT EPA identified in Section 2. Use a separate page for each non-compliance.

The date and time of the non-compliance.
1/11/2024 (start of wet season)
When the non-compliance was detected and by whom.
Non-compliance detected at the time of receiving lab results.
The actual and potential causes and contributing factors to the non-compliance.
PRI did not sample SW01, SW02, SW03, SW04 or SW05 at start of the wet season as per condition 41 of the licence.
The risk of environmental harm arising from the non-compliance.
Omitting some sampling may delay detection of environmental effects that could otherwise be addressed.
The action(s) that have or will be undertaken to mitigate any environmental harm arising from the non-compliance.
- Where no samples taken: a sampling calendar has been developed and implemented for staff to reference. - Where SW sites not flowing: Pictures to be taken as evidence of attempt to sample when surface water sites are dry during a rain event if proposing to use alternative sites for sampling. - No sample taken GW: A large maintenance program to reequip bores and cap decommissioned bores has been proposed. Bores have now been labelled on site to assist sampling staff and equipment purchased to allow for the sampling of decommissioned bores. - Bacterial, TN and TP exceedances at ADP2: hydrogen peroxide injection has been implemented since 2024 to help reduce bacterial load, large aeration pumps have been installed to reduce lagoon sludge, denitrify, and reduce bacteria load. - Bacterial, TN and TP exceedances at ADP1: Ongoing expert advice through a local consultant for physical, biological and chemical treatment recommendations are underway with proposals in place for delivery. - Exceedances in GW: The bore network is proposed to be surveyed as soon as possible to determine ground water flows.
Corrective actions that have or will be undertaken to ensure the non-compliance does not reoccur.
- Where no samples taken: a sampling calendar has been developed and implemented for staff to reference. - Where SW sites not flowing: Pictures to be taken as evidence of attempt to sample when surface water sites are dry during a rain event if proposing to use alternative sites for sampling. - No sample taken GW: A large maintenance program to reequip bores and cap decommissioned bores has been proposed. Bores have now been labelled on site to assist sampling staff and equipment purchased to allow for the sampling of decommissioned bores. - Bacterial, TN and TP exceedances at ADP2: hydrogen peroxide injection has been implemented since 2024 to help reduce bacterial load, large aeration pumps have been installed to reduce lagoon sludge, denitrify, and reduce bacteria load. - Bacterial, TN and TP exceedances at ADP1: Ongoing expert advice through a local consultant for physical, biological and chemical treatment recommendations.

- Exceedances in GW: The bore network is proposed to be surveyed by January 2026 to determine ground water flows.

If no action was taken, why no action was taken.

The date and time of the non-compliance.

31/01/2025 (mid wet season)

When the non-compliance was detected and by whom.

Non-compliance detected at the time of receiving lab results.

The actual and potential causes and contributing factors to the non-compliance.

PRI did not sample SW01, SW02, SW03, SW04 or SW05 mid wet season as per condition 41 of the licence.

The risk of environmental harm arising from the non-compliance.

Omitting some sampling may delay detection of environmental effects that could otherwise be addressed.

The action(s) that have or will be undertaken to mitigate any environmental harm arising from the non-compliance.

- Where no samples taken: a sampling calendar has been developed and implemented for staff to reference.
- Where SW sites not flowing: Pictures to be taken as evidence of attempt to sample when surface water sites are dry during a rain event if proposing to use alternative sites for sampling.
- No sample taken GW: A large maintenance program to reequip bores and cap decommissioned bores has been proposed. Bores have now been labelled on site to assist sampling staff and equipment purchased to allow for the sampling of decommissioned bores.
- Bacterial, TN and TP exceedances at ADP2: hydrogen peroxide injection has been implemented since 2024 to help reduce bacterial load, large aeration pumps have been installed to reduce lagoon sludge, denitrify, and reduce bacteria load.
- Bacterial, TN and TP exceedances at ADP1: Ongoing expert advice through a local consultant for physical, biological and chemical treatment recommendations are underway with proposals in place for delivery.
- Exceedances in GW: The bore network is proposed to be surveyed as soon as possible to determine ground water flows.

Corrective actions that have or will be undertaken to ensure the non-compliance does not reoccur.

- Where no samples taken: a sampling calendar has been developed and implemented for staff to reference.
- Where SW sites not flowing: Pictures to be taken as evidence of attempt to sample when surface water sites are dry during a rain event if proposing to use alternative sites for sampling.

- No sample taken GW: A large maintenance program to reequip bores and cap decommissioned bores has been proposed. Bores have now been labelled on site to assist sampling staff and equipment purchased to allow for the sampling of decommissioned bores.
- Bacterial, TN and TP exceedances at ADP2: hydrogen peroxide injection has been implemented since 2024 to help reduce bacterial load, large aeration pumps have been installed to reduce lagoon sludge, denitrify, and reduce bacteria load.
- Bacterial, TN and TP exceedances at ADP1: Ongoing expert advice through a local consultant for physical, biological and chemical treatment recommendations.
- Exceedances in GW: The bore network is proposed to be surveyed by January 2026 to determine ground water flows.

If no action was taken, why no action was taken.

The date and time of the non-compliance.

7/04/2025 (end wet season)

When the non-compliance was detected and by whom.

Non-compliance detected at the time of receiving lab results.

The actual and potential causes and contributing factors to the non-compliance.

PRI did not sample SW01, SW02, SW03 or SW04 at the end of the wet season as per condition 41 of the licence.

The risk of environmental harm arising from the non-compliance.

Omitting some sampling may delay detection of environmental effects that could otherwise be addressed.

The action(s) that have or will be undertaken to mitigate any environmental harm arising from the non-compliance.

- Where no samples taken: a sampling calendar has been developed and implemented for staff to reference.
- Where SW sites not flowing: Pictures to be taken as evidence of attempt to sample when surface water sites are dry during a rain event if proposing to use alternative sites for sampling.
- No sample taken GW: A large maintenance program to reequip bores and cap decommissioned bores has been proposed. Bores have now been labelled on site to assist sampling staff and equipment purchased to allow for the sampling of decommissioned bores.
- Bacterial, TN and TP exceedances at ADP2: hydrogen peroxide injection has been implemented since 2024 to help reduce bacterial load, large aeration pumps have been installed to reduce lagoon sludge, denitrify, and reduce bacteria load.
- Bacterial, TN and TP exceedances at ADP1: Ongoing expert advice through a local consultant for physical, biological and chemical treatment recommendations are underway with proposals in place for delivery.
- Exceedances in GW: The bore network is proposed to be surveyed as soon as possible to determine ground water flows.

Corrective actions that have or will be undertaken to ensure the non-compliance does not reoccur.

- Where no samples taken: a sampling calendar has been developed and implemented for staff to reference.
- Where SW sites not flowing: Pictures to be taken as evidence of attempt to sample when surface water sites are dry during a rain event if proposing to use alternative sites for sampling.
- No sample taken GW: A large maintenance program to reequip bores and cap decommissioned bores has been proposed. Bores have now been labelled on site to assist sampling staff and equipment purchased to allow for the sampling of decommissioned bores.
- Bacterial, TN and TP exceedances at ADP2: hydrogen peroxide injection has been implemented since 2024 to help reduce bacterial load, large aeration pumps have been installed to reduce lagoon sludge, denitrify, and reduce bacteria load.
- Bacterial, TN and TP exceedances at ADP1: Ongoing expert advice through a local consultant for physical, biological and chemical treatment recommendations.
- Exceedances in GW: The bore network is proposed to be surveyed by January 2026 to determine ground water flows.

If no action was taken, why no action was taken.

The date and time of the non-compliance.

2/05/2024

When the non-compliance was detected and by whom.

Non-compliance detected at the time of receiving lab results.

The actual and potential causes and contributing factors to the non-compliance.

- PRI did not sample GW4, GW5 or GW7 as per condition 41 of the licence. Bores were not equipped at the time to allow sampling. A long-term maintenance program will be implemented to allow sampling from these bores.
- Irrigation plantation had an exceedance of Total coliforms and Enterococci
- Irrigation pivot had an exceedance of E. coli, Total coliforms, Enterococci
- GW2 (bore 10) had exceedances of TN and Enterococci
- GW3 (Bore 2) had exceedances of TN
- SW05 had exceedances of TN and TP

The risk of environmental harm arising from the non-compliance.

- Omitting some sampling may delay detection of environmental effects that could otherwise be addressed
- Elevated bacteria and nutrients may be carried by runoff into water and soil systems.

The action(s) that have or will be undertaken to mitigate any environmental harm arising from the non-compliance.

- Where no samples taken: a sampling calendar has been developed and implemented for staff to reference.

- Where SW sites not flowing: Pictures to be taken as evidence of attempt to sample when surface water sites are dry during a rain event if proposing to use alternative sites for sampling. - No sample taken GW: A large maintenance program to reequip bores and cap decommissioned bores has been proposed. Bores have now been labelled on site to assist sampling staff and equipment purchased to allow for the sampling of decommissioned bores. - Bacterial, TN and TP exceedances at ADP2: hydrogen peroxide injection has been implemented since 2024 to help reduce bacterial load, large aeration pumps have been installed to reduce lagoon sludge, denitrify, and reduce bacteria load. - Bacterial, TN and TP exceedances at ADP1: Ongoing expert advice through a local consultant for physical, biological and chemical treatment recommendations are underway with proposals in place for delivery. - Exceedances in GW: The bore network is proposed to be surveyed as soon as possible to determine ground water flows.
Corrective actions that have or will be undertaken to ensure the non-compliance does not reoccur.
- Where no samples taken: a sampling calendar has been developed and implemented for staff to reference. - Where SW sites not flowing: Pictures to be taken as evidence of attempt to sample when surface water sites are dry during a rain event if proposing to use alternative sites for sampling. - No sample taken GW: A large maintenance program to reequip bores and cap decommissioned bores has been proposed. Bores have now been labelled on site to assist sampling staff and equipment purchased to allow for the sampling of decommissioned bores. - Bacterial, TN and TP exceedances at ADP2: hydrogen peroxide injection has been implemented since 2024 to help reduce bacterial load, large aeration pumps have been installed to reduce lagoon sludge, denitrify, and reduce bacteria load. - Bacterial, TN and TP exceedances at ADP1: Ongoing expert advice through a local consultant for physical, biological and chemical treatment recommendations. - Exceedances in GW: The bore network is proposed to be surveyed by January 2026 to determine ground water flows.
If no action was taken, why no action was taken.

The date and time of the non-compliance.
15/05/2025
When the non-compliance was detected and by whom.
Non-compliance detected at the time of receiving lab results.
The actual and potential causes and contributing factors to the non-compliance.
- Irrigation plantation had an exceedance of total coliforms - Irrigation pivot had exceedances of E. coli, Total Coliforms, Enterococci - GW1 (Bore 4) had exceedances of TP, Total coliforms - GW2 (Bore 10) had exceedances of TN, TP, E. coli, Total coliforms, Enterococci - GW3 (Bore 2) had exceedances of TP, Total coliforms - SW05 had exceedances of TN, TP, and Total Coliforms
The risk of environmental harm arising from the non-compliance.

- Elevated bacteria and nutrients may be carried by runoff into water and soil systems.

The action(s) that have or will be undertaken to mitigate any environmental harm arising from the non-compliance.

- Where no samples taken: a sampling calendar has been developed and implemented for staff to reference.
- Where SW sites not flowing: Pictures to be taken as evidence of attempt to sample when surface water sites are dry during a rain event if proposing to use alternative sites for sampling.
- No sample taken GW: A large maintenance program to reequip bores and cap decommissioned bores has been proposed. Bores have now been labelled on site to assist sampling staff and equipment purchased to allow for the sampling of decommissioned bores.
- Bacterial, TN and TP exceedances at ADP2: hydrogen peroxide injection has been implemented since 2024 to help reduce bacterial load, large aeration pumps have been installed to reduce lagoon sludge, denitrify, and reduce bacteria load.
- Bacterial, TN and TP exceedances at ADP1: Ongoing expert advice through a local consultant for physical, biological and chemical treatment recommendations are underway with proposals in place for delivery.
- Exceedances in GW: The bore network is proposed to be surveyed as soon as possible to determine ground water flows.

Corrective actions that have or will be undertaken to ensure the non-compliance does not reoccur.

- Where no samples taken: a sampling calendar has been developed and implemented for staff to reference.
- Where SW sites not flowing: Pictures to be taken as evidence of attempt to sample when surface water sites are dry during a rain event if proposing to use alternative sites for sampling.
- No sample taken GW: A large maintenance program to reequip bores and cap decommissioned bores has been proposed. Bores have now been labelled on site to assist sampling staff and equipment purchased to allow for the sampling of decommissioned bores.
- Bacterial, TN and TP exceedances at ADP2: hydrogen peroxide injection has been implemented since 2024 to help reduce bacterial load, large aeration pumps have been installed to reduce lagoon sludge, denitrify, and reduce bacteria load.
- Bacterial, TN and TP exceedances at ADP1: Ongoing expert advice through a local consultant for physical, biological and chemical treatment recommendations.
- Exceedances in GW: The bore network is proposed to be surveyed by January 2026 to determine ground water flows.

If no action was taken, why no action was taken.

The date and time of the non-compliance.

12/06/2024

When the non-compliance was detected and by whom.

Non-compliance detected at the time of receiving lab results.

The actual and potential causes and contributing factors to the non-compliance.

- Irrigation plantation had an exceedance of Total Coliforms
- Irrigation pivot had exceedances of E. coli, Total Coliforms, Enterococci
- GW1 (Bore 4) had exceedances of TN
- GW2 (Bore 10) had exceedances of TN, TP, E. coli, Total coliforms
- GW3 (Bore 2) had exceedances of TN
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The risk of environmental harm arising from the non-compliance.

- Omitting some sampling may delay detection of environmental effects that could otherwise be addressed
- Elevated bacteria and nutrients may be carried by runoff into water and soil systems.

The action(s) that have or will be undertaken to mitigate any environmental harm arising from the non-compliance.

- Where no samples taken: a sampling calendar has been developed and implemented for staff to reference.
- Where SW sites not flowing: Pictures to be taken as evidence of attempt to sample when surface water sites are dry during a rain event if proposing to use alternative sites for sampling.
- No sample taken GW: A large maintenance program to reequip bores and cap decommissioned bores has been proposed. Bores have now been labelled on site to assist sampling staff and equipment purchased to allow for the sampling of decommissioned bores.
- Bacterial, TN and TP exceedances at ADP2: hydrogen peroxide injection has been implemented since 2024 to help reduce bacterial load, large aeration pumps have been installed to reduce lagoon sludge, denitrify, and reduce bacteria load.
- Bacterial, TN and TP exceedances at ADP1: Ongoing expert advice through a local consultant for physical, biological and chemical treatment recommendations are underway with proposals in place for delivery.
- Exceedances in GW: The bore network is proposed to be surveyed as soon as possible to determine ground water flows.

Corrective actions that have or will be undertaken to ensure the non-compliance does not reoccur.

- Where no samples taken: a sampling calendar has been developed and implemented for staff to reference.
- Where SW sites not flowing: Pictures to be taken as evidence of attempt to sample when surface water sites are dry during a rain event if proposing to use alternative sites for sampling.
- No sample taken GW: A large maintenance program to reequip bores and cap decommissioned bores has been proposed. Bores have now been labelled on site to assist sampling staff and equipment purchased to allow for the sampling of decommissioned bores.
- Bacterial, TN and TP exceedances at ADP2: hydrogen peroxide injection has been implemented since 2024 to help reduce bacterial load, large aeration pumps have been installed to reduce lagoon sludge, denitrify, and reduce bacteria load.
- Bacterial, TN and TP exceedances at ADP1: Ongoing expert advice through a local consultant for physical, biological and chemical treatment recommendations.
- Exceedances in GW: The bore network is proposed to be surveyed by January 2026 to determine ground water flows.

If no action was taken, why no action was taken.

The date and time of the non-compliance.

11/07/2024

When the non-compliance was detected and by whom.

Non-compliance detected at the time of receiving lab results.

The actual and potential causes and contributing factors to the non-compliance.

- Irrigation plantation had an exceedance of Total Coliforms
- Irrigation pivot had exceedances of E. coli, Total Coliforms, Enterococci
- GW1 (Bore 4) had exceedances of TN, E coli
- GW2 (Bore 10) had exceedances of pH, TN, TP
- GW3 (Bore 2) had exceedances of TP, Total Coliforms

The risk of environmental harm arising from the non-compliance.

- Elevated bacteria and nutrients may be carried by runoff into water and soil systems.

The action(s) that have or will be undertaken to mitigate any environmental harm arising from the non-compliance.

- Where no samples taken: a sampling calendar has been developed and implemented for staff to reference.
- Where SW sites not flowing: Pictures to be taken as evidence of attempt to sample when surface water sites are dry during a rain event if proposing to use alternative sites for sampling.
- No sample taken GW: A large maintenance program to reequip bores and cap decommissioned bores has been proposed. Bores have now been labelled on site to assist sampling staff and equipment purchased to allow for the sampling of decommissioned bores.
- Bacterial, TN and TP exceedances at ADP2: hydrogen peroxide injection has been implemented since 2024 to help reduce bacterial load, large aeration pumps have been installed to reduce lagoon sludge, denitrify, and reduce bacteria load.
- Bacterial, TN and TP exceedances at ADP1: Ongoing expert advice through a local consultant for physical, biological and chemical treatment recommendations are underway with proposals in place for delivery.
- Exceedances in GW: The bore network is proposed to be surveyed as soon as possible to determine ground water flows.

Corrective actions that have or will be undertaken to ensure the non-compliance does not reoccur.

- Where no samples taken: a sampling calendar has been developed and implemented for staff to reference.
- Where SW sites not flowing: Pictures to be taken as evidence of attempt to sample when surface water sites are dry during a rain event if proposing to use alternative sites for sampling.
- No sample taken GW: A large maintenance program to reequip bores and cap decommissioned bores has been proposed. Bores have now been labelled on site to assist sampling staff and equipment purchased to allow for the sampling of decommissioned bores.
- Bacterial, TN and TP exceedances at ADP2: hydrogen peroxide injection has been implemented since 2024 to help reduce bacterial load, large aeration pumps have been installed to reduce lagoon sludge, denitrify, and reduce bacteria load.
- Bacterial, TN and TP exceedances at ADP1: Ongoing expert advice through a local consultant for physical, biological and chemical treatment recommendations.
- Exceedances in GW: The bore network is proposed to be surveyed by January 2026 to determine ground water flows.

If no action was taken, why no action was taken.

The date and time of the non-compliance.

15/08/2024

When the non-compliance was detected and by whom.

Non-compliance detected at the time of receiving lab results.

The actual and potential causes and contributing factors to the non-compliance.

- Irrigation plantation had an exceedance of Total coliforms
- Irrigation pivot had exceedances of E. coli, Total Coliforms, Enterococci
- GW2 (Bore 10) had exceedances of pH, E. coli, Total coliforms, Enterococci
- GW3 (Bore 2) had exceedances of Total coliforms

The risk of environmental harm arising from the non-compliance.

- Elevated bacteria and nutrients may be carried by runoff into water and soil systems.

The action(s) that have or will be undertaken to mitigate any environmental harm arising from the non-compliance.

- Where no samples taken: a sampling calendar has been developed and implemented for staff to reference.
- Where SW sites not flowing: Pictures to be taken as evidence of attempt to sample when surface water sites are dry during a rain event if proposing to use alternative sites for sampling.
- No sample taken GW: A large maintenance program to reequip bores and cap decommissioned bores has been proposed. Bores have now been labelled on site to assist sampling staff and equipment purchased to allow for the sampling of decommissioned bores.
- Bacterial, TN and TP exceedances at ADP2: hydrogen peroxide injection has been implemented since 2024 to help reduce bacterial load, large aeration pumps have been installed to reduce lagoon sludge, denitrify, and reduce bacteria load.
- Bacterial, TN and TP exceedances at ADP1: Ongoing expert advice through a local consultant for physical, biological and chemical treatment recommendations are underway with proposals in place for delivery.
- Exceedances in GW: The bore network is proposed to be surveyed as soon as possible to determine ground water flows.

Corrective actions that have or will be undertaken to ensure the non-compliance does not reoccur.

- Where no samples taken: a sampling calendar has been developed and implemented for staff to reference.
- Where SW sites not flowing: Pictures to be taken as evidence of attempt to sample when surface water sites are dry during a rain event if proposing to use alternative sites for sampling.
- No sample taken GW: A large maintenance program to reequip bores and cap decommissioned bores has been proposed. Bores have now been labelled on site to assist sampling staff and equipment purchased to allow for the sampling of decommissioned bores.
- Bacterial, TN and TP exceedances at ADP2: hydrogen peroxide injection has been implemented since 2024 to help reduce bacterial load, large aeration pumps have been installed to reduce lagoon sludge, denitrify, and reduce bacteria load.
- Bacterial, TN and TP exceedances at ADP1: Ongoing expert advice through a local consultant for physical, biological and chemical treatment recommendations.

- Exceedances in GW: The bore network is proposed to be surveyed by January 2026 to determine ground water flows.

If no action was taken, why no action was taken.

The date and time of the non-compliance.

11/09/2024

When the non-compliance was detected and by whom.

Non-compliance detected at the time of receiving lab results.

The actual and potential causes and contributing factors to the non-compliance.

- Irrigation plantation had an exceedance of pH, Total coliforms
- Irrigation pivot had exceedances of E. coli, Total Coliforms, Enterococci
- GW2 (Bore 10) had an exceedance of TP
- GW3 (Bore 2) had an exceedance of TP

The risk of environmental harm arising from the non-compliance.

- Elevated bacteria and nutrients may be carried by runoff into water and soil systems.

The action(s) that have or will be undertaken to mitigate any environmental harm arising from the non-compliance.

- Where no samples taken: a sampling calendar has been developed and implemented for staff to reference.
- Where SW sites not flowing: Pictures to be taken as evidence of attempt to sample when surface water sites are dry during a rain event if proposing to use alternative sites for sampling.
- No sample taken GW: A large maintenance program to reequip bores and cap decommissioned bores has been proposed. Bores have now been labelled on site to assist sampling staff and equipment purchased to allow for the sampling of decommissioned bores.
- Bacterial, TN and TP exceedances at ADP2: hydrogen peroxide injection has been implemented since 2024 to help reduce bacterial load, large aeration pumps have been installed to reduce lagoon sludge, denitrify, and reduce bacteria load.
- Bacterial, TN and TP exceedances at ADP1: Ongoing expert advice through a local consultant for physical, biological and chemical treatment recommendations are underway with proposals in place for delivery.
- Exceedances in GW: The bore network is proposed to be surveyed as soon as possible to determine ground water flows.

Corrective actions that have or will be undertaken to ensure the non-compliance does not reoccur.

- Where no samples taken: a sampling calendar has been developed and implemented for staff to reference.
- Where SW sites not flowing: Pictures to be taken as evidence of attempt to sample when surface water sites are dry during a rain event if proposing to use alternative sites for sampling.
- No sample taken GW: A large maintenance program to reequip bores and cap decommissioned bores has been proposed. Bores have now been labelled on site to assist sampling staff and equipment purchased to allow for the sampling of decommissioned bores.
- Bacterial, TN and TP exceedances at ADP2: hydrogen peroxide injection has been implemented since 2024 to help reduce bacterial load, large aeration pumps have been installed to reduce lagoon sludge, denitrify, and reduce bacteria load.
- Bacterial, TN and TP exceedances at ADP1: Ongoing expert advice through a local consultant for physical, biological and chemical treatment recommendations.
- Exceedances in GW: The bore network is proposed to be surveyed by January 2026 to determine ground water flows.

If no action was taken, why no action was taken.

The date and time of the non-compliance.

17/10/2024

When the non-compliance was detected and by whom.

Non-compliance detected at the time of receiving lab results.

The actual and potential causes and contributing factors to the non-compliance.

- PRI did not sample GW4, GW5 or GW7 as per condition 41 of the licence.
- Irrigation plantation had an exceedance of pH and Total coliforms
- Irrigation pivot had exceedances of E. coli, Total coliforms, Enterococci
- GW2 (Bore 10) had an exceedance of E. coli, Total coliforms and Enterococci,

The risk of environmental harm arising from the non-compliance.

- Omitting some sampling may delay detection of environmental effects that could otherwise be addressed
- Elevated bacteria and nutrients may be carried by runoff into water and soil systems.

The action(s) that have or will be undertaken to mitigate any environmental harm arising from the non-compliance.

- Where no samples taken: a sampling calendar has been developed and implemented for staff to reference.
- Where SW sites not flowing: Pictures to be taken as evidence of attempt to sample when surface water sites are dry during a rain event if proposing to use alternative sites for sampling.
- No sample taken GW: A large maintenance program to reequip bores and cap decommissioned bores has been proposed. Bores have now been labelled on site to assist sampling staff and equipment purchased to allow for the sampling of decommissioned bores.

- Bacterial, TN and TP exceedances at ADP2: hydrogen peroxide injection has been implemented since 2024 to help reduce bacterial load, large aeration pumps have been installed to reduce lagoon sludge, denitrify, and reduce bacteria load.
- Bacterial, TN and TP exceedances at ADP1: Ongoing expert advice through a local consultant for physical, biological and chemical treatment recommendations are underway with proposals in place for delivery.
- Exceedances in GW: The bore network is proposed to be surveyed as soon as possible to determine ground water flows.

Corrective actions that have or will be undertaken to ensure the non-compliance does not reoccur.

- Where no samples taken: a sampling calendar has been developed and implemented for staff to reference.
- Where SW sites not flowing: Pictures to be taken as evidence of attempt to sample when surface water sites are dry during a rain event if proposing to use alternative sites for sampling.
- No sample taken GW: A large maintenance program to reequip bores and cap decommissioned bores has been proposed. Bores have now been labelled on site to assist sampling staff and equipment purchased to allow for the sampling of decommissioned bores.
- Bacterial, TN and TP exceedances at ADP2: hydrogen peroxide injection has been implemented since 2024 to help reduce bacterial load, large aeration pumps have been installed to reduce lagoon sludge, denitrify, and reduce bacteria load.
- Bacterial, TN and TP exceedances at ADP1: Ongoing expert advice through a local consultant for physical, biological and chemical treatment recommendations.
- Exceedances in GW: The bore network is proposed to be surveyed by January 2026 to determine ground water flows.

If no action was taken, why no action was taken.

The date and time of the non-compliance.

13/11/2024

When the non-compliance was detected and by whom.

Non-compliance detected at the time of receiving lab results.

The actual and potential causes and contributing factors to the non-compliance.

- Irrigation plantation had an exceedance of pH, Total coliforms
- GW1 (Bore 4) had exceedances of TN, TP, Total coliforms
- GW2 (Bore 10) had an exceedance of E. coli
- GW3 (Bore 5) had an exceedance of TN

The risk of environmental harm arising from the non-compliance.

- Elevated bacteria and nutrients may be carried by runoff into water and soil systems.

The action(s) that have or will be undertaken to mitigate any environmental harm arising from the non-compliance.

- Where no samples taken: a sampling calendar has been developed and implemented for staff to reference.
- Where SW sites not flowing: Pictures to be taken as evidence of attempt to sample when surface water sites are dry during a rain event if proposing to use alternative sites for sampling.
- No sample taken GW: A large maintenance program to reequip bores and cap decommissioned bores has been proposed. Bores have now been labelled on site to assist sampling staff and equipment purchased to allow for the sampling of decommissioned bores.
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- Bacterial, TN and TP exceedances at ADP1: Ongoing expert advice through a local consultant for physical, biological and chemical treatment recommendations are underway with proposals in place for delivery.
- Exceedances in GW: The bore network is proposed to be surveyed as soon as possible to determine ground water flows.

Corrective actions that have or will be undertaken to ensure the non-compliance does not reoccur.

- Where no samples taken: a sampling calendar has been developed and implemented for staff to reference.
- Where SW sites not flowing: Pictures to be taken as evidence of attempt to sample when surface water sites are dry during a rain event if proposing to use alternative sites for sampling.
- No sample taken GW: A large maintenance program to reequip bores and cap decommissioned bores has been proposed. Bores have now been labelled on site to assist sampling staff and equipment purchased to allow for the sampling of decommissioned bores.
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- Bacterial, TN and TP exceedances at ADP1: Ongoing expert advice through a local consultant for physical, biological and chemical treatment recommendations.
- Exceedances in GW: The bore network is proposed to be surveyed by January 2026 to determine ground water flows.

If no action was taken, why no action was taken.

The date and time of the non-compliance.

16/12/2024

When the non-compliance was detected and by whom.

Non-compliance detected at the time of receiving lab results.

The actual and potential causes and contributing factors to the non-compliance.

- Irrigation plantation had an exceedance of E. coli, Total coliforms
- Irrigation pivot had exceedances of E. coli, Total coliforms,
- GW1 (Bore 4) had exceedances of TN, Total coliforms
- GW2 (Bore 10) had an exceedance of E. coli, Total coliforms, Enterococci
- GW3 (Bore 2) had an exceedance of Total coliforms, Enterococci

The risk of environmental harm arising from the non-compliance.

- Omitting some sampling may delay detection of environmental effects that could otherwise be addressed
- Elevated bacteria and nutrients may be carried by runoff into water and soil systems.

The action(s) that have or will be undertaken to mitigate any environmental harm arising from the non-compliance.

- Where no samples taken: a sampling calendar has been developed and implemented for staff to reference.
- Where SW sites not flowing: Pictures to be taken as evidence of attempt to sample when surface water sites are dry during a rain event if proposing to use alternative sites for sampling.
- No sample taken GW: A large maintenance program to reequip bores and cap decommissioned bores has been proposed. Bores have now been labelled on site to assist sampling staff and equipment purchased to allow for the sampling of decommissioned bores.
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- Bacterial, TN and TP exceedances at ADP1: Ongoing expert advice through a local consultant for physical, biological and chemical treatment recommendations are underway with proposals in place for delivery.
- Exceedances in GW: The bore network is proposed to be surveyed as soon as possible to determine ground water flows.

Corrective actions that have or will be undertaken to ensure the non-compliance does not reoccur.

- Where no samples taken: a sampling calendar has been developed and implemented for staff to reference.
- Where SW sites not flowing: Pictures to be taken as evidence of attempt to sample when surface water sites are dry during a rain event if proposing to use alternative sites for sampling.
- No sample taken GW: A large maintenance program to reequip bores and cap decommissioned bores has been proposed. Bores have now been labelled on site to assist sampling staff and equipment purchased to allow for the sampling of decommissioned bores.
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- Bacterial, TN and TP exceedances at ADP1: Ongoing expert advice through a local consultant for physical, biological and chemical treatment recommendations.
- Exceedances in GW: The bore network is proposed to be surveyed by January 2026 to determine ground water flows.

If no action was taken, why no action was taken.

The date and time of the non-compliance.

29/01/2025

When the non-compliance was detected and by whom.

Non-compliance detected at the time of receiving lab results.

The actual and potential causes and contributing factors to the non-compliance.

- PRI did not sample GW4, GW5 or GW7 as per condition 41 of the licence.
- Irrigation plantation had an exceedance of Total coliforms
- Irrigation pivot had exceedances of E. coli, Total coliforms, Enterococci
- GW1 (Bore 4) had exceedances of TN, TP, E. coli, Total coliforms
- GW2 (Bore 10) had an exceedance of TP
- GW3 (Bore 2) had an exceedance of TN, Enterococci

The risk of environmental harm arising from the non-compliance.

- Omitting some sampling may delay detection of environmental effects that could otherwise be addressed
- Elevated bacteria and nutrients may be carried by runoff into water and soil systems.

The action(s) that have or will be undertaken to mitigate any environmental harm arising from the non-compliance.

- Where no samples taken: a sampling calendar has been developed and implemented for staff to reference.
- Where SW sites not flowing: Pictures to be taken as evidence of attempt to sample when surface water sites are dry during a rain event if proposing to use alternative sites for sampling.
- No sample taken GW: A large maintenance program to reequip bores and cap decommissioned bores has been proposed. Bores have now been labelled on site to assist sampling staff and equipment purchased to allow for the sampling of decommissioned bores.
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- Bacterial, TN and TP exceedances at ADP1: Ongoing expert advice through a local consultant for physical, biological and chemical treatment recommendations are underway with proposals in place for delivery.
- Exceedances in GW: The bore network is proposed to be surveyed as soon as possible to determine ground water flows.

Corrective actions that have or will be undertaken to ensure the non-compliance does not reoccur.

- Where no samples taken: a sampling calendar has been developed and implemented for staff to reference.
- Where SW sites not flowing: Pictures to be taken as evidence of attempt to sample when surface water sites are dry during a rain event if proposing to use alternative sites for sampling.
- No sample taken GW: A large maintenance program to reequip bores and cap decommissioned bores has been proposed. Bores have now been labelled on site to assist sampling staff and equipment purchased to allow for the sampling of decommissioned bores.
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- Bacterial, TN and TP exceedances at ADP1: Ongoing expert advice through a local consultant for physical, biological and chemical treatment recommendations.
- Exceedances in GW: The bore network is proposed to be surveyed by January 2026 to determine ground water flows.

If no action was taken, why no action was taken.

The date and time of the non-compliance.

3/02/2025

When the non-compliance was detected and by whom.

Non-compliance detected at the time of receiving lab results.

The actual and potential causes and contributing factors to the non-compliance.

- SS1 had exceedances of Enterococci, Total Coliforms, TP, TN
- SS2 had exceedances of Enterococci, pH, TP, TN and EC
- SS3 had exceedances of Enterococci, Total Coliforms, EC, TP and TN
- SS4 had exceedances of EC, TP and TN
- SS5 had exceedances of Enterococci, TN and EC
- SS6 had exceedances of Enterococci, Total Coliforms, EC, TP and TN
- SS7 had exceedances of Enterococci, Total coliforms, TP, TN and EC
- SS8 had exceedances of Enterococci, TP and TN
- SS9 had exceedances of Enterococci, Total coliforms, TP, TN and EC
- SS10 had exceedances of Enterococci, Total Coliforms, TP, TN and EC

The risk of environmental harm arising from the non-compliance.

- Elevated bacteria and nutrients may be carried by runoff into water and soil systems.

The action(s) that have or will be undertaken to mitigate any environmental harm arising from the non-compliance.

- Where no samples taken: a sampling calendar has been developed and implemented for staff to reference.
- Where SW sites not flowing: Pictures to be taken as evidence of attempt to sample when surface water sites are dry during a rain event if proposing to use alternative sites for sampling.
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- Exceedances in GW: The bore network is proposed to be surveyed as soon as possible to determine ground water flows.

Corrective actions that have or will be undertaken to ensure the non-compliance does not reoccur.

- Where no samples taken: a sampling calendar has been developed and implemented for staff to reference.
- Where SW sites not flowing: Pictures to be taken as evidence of attempt to sample when surface water sites are dry during a rain event if proposing to use alternative sites for sampling.
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- Bacterial, TN and TP exceedances at ADP1: Ongoing expert advice through a local consultant for physical, biological and chemical treatment recommendations.

- Exceedances in GW: The bore network is proposed to be surveyed by January 2026 to determine ground water flows.

If no action was taken, why no action was taken.

The date and time of the non-compliance.

19/02/2025

When the non-compliance was detected and by whom.

Non-compliance detected at the time of receiving lab results.

The actual and potential causes and contributing factors to the non-compliance.

- Irrigation plantation had an exceedance of Total coliforms
- Irrigation pivot had exceedances of E. coli, Total coliforms, Enterococci
- GW1 (Bore 4) had exceedances of TP, Total coliforms
- GW2 (Bore 10) had an exceedance of TN, E. coli, Total coliforms,
- GW3 (Bore 2) had an exceedance of TP, Total coliforms

The risk of environmental harm arising from the non-compliance.

- Elevated bacteria and nutrients may be carried by runoff into water and soil systems.

The action(s) that have or will be undertaken to mitigate any environmental harm arising from the non-compliance.

- Where no samples taken: a sampling calendar has been developed and implemented for staff to reference.
- Where SW sites not flowing: Pictures to be taken as evidence of attempt to sample when surface water sites are dry during a rain event if proposing to use alternative sites for sampling.
- No sample taken GW: A large maintenance program to reequip bores and cap decommissioned bores has been proposed. Bores have now been labelled on site to assist sampling staff and equipment purchased to allow for the sampling of decommissioned bores.
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- Bacterial, TN and TP exceedances at ADP1: Ongoing expert advice through a local consultant for physical, biological and chemical treatment recommendations are underway with proposals in place for delivery.
- Exceedances in GW: The bore network is proposed to be surveyed as soon as possible to determine ground water flows.

Corrective actions that have or will be undertaken to ensure the non-compliance does not reoccur.

- Where no samples taken: a sampling calendar has been developed and implemented for staff to reference.
- Where SW sites not flowing: Pictures to be taken as evidence of attempt to sample when surface water sites are dry during a rain event if proposing to use alternative sites for sampling.
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- Bacterial, TN and TP exceedances at ADP1: Ongoing expert advice through a local consultant for physical, biological and chemical treatment recommendations.
- Exceedances in GW: The bore network is proposed to be surveyed by January 2026 to determine ground water flows.

If no action was taken, why no action was taken.

The date and time of the non-compliance.

27/03/2025

When the non-compliance was detected and by whom.

Non-compliance detected at the time of receiving lab results.

The actual and potential causes and contributing factors to the non-compliance.

- Irrigation plantation had an exceedance of Total coliforms, Enterococci
- Irrigation pivot had exceedances of E. coli, Total coliforms, Enterococci
- GW2 (Bore 10) had an exceedance of TP, E. coli, Total coliforms, Enterococci
- GW3 (Bore 2) had exceedances of TN
- SW05 had exceedances of TN, TP, E. coli

The risk of environmental harm arising from the non-compliance.

- Elevated bacteria and nutrients may be carried by runoff into water and soil systems.

The action(s) that have or will be undertaken to mitigate any environmental harm arising from the non-compliance.

- Where no samples taken: a sampling calendar has been developed and implemented for staff to reference.
- Where SW sites not flowing: Pictures to be taken as evidence of attempt to sample when surface water sites are dry during a rain event if proposing to use alternative sites for sampling.
- No sample taken GW: A large maintenance program to reequip bores and cap decommissioned bores has been proposed. Bores have now been labelled on site to assist sampling staff and equipment purchased to allow for the sampling of decommissioned bores.

- Bacterial, TN and TP exceedances at ADP2: hydrogen peroxide injection has been implemented since 2024 to help reduce bacterial load, large aeration pumps have been installed to reduce lagoon sludge, denitrify, and reduce bacteria load. - Bacterial, TN and TP exceedances at ADP1: Ongoing expert advice through a local consultant for physical, biological and chemical treatment recommendations are underway with proposals in place for delivery. - Exceedances in GW: The bore network is proposed to be surveyed as soon as possible to determine ground water flows.
Corrective actions that have or will be undertaken to ensure the non-compliance does not reoccur.
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If no action was taken, why no action was taken.

The date and time of the non-compliance.
23/04/2025
When the non-compliance was detected and by whom.
Non-compliance detected at the time of receiving lab results.
The actual and potential causes and contributing factors to the non-compliance.
- PRI did not sample GW4, GW5 or GW7 as per condition 41 of the licence - Irrigation plantation had an exceedance of Total coliforms - Irrigation pivot had exceedances of E. coli, Total coliforms - GW1 (Bore 4) had exceedances of TN, TP - GW2 (Bore 10) had an exceedance of pH, TN, Total coliforms, Enterococci - SW05 had exceedances of TN, TP, Total coliforms, Enterococci
The risk of environmental harm arising from the non-compliance.
- Omitting some sampling may delay detection of environmental effects that could otherwise be addressed - Elevated bacteria and nutrients may be carried by runoff into water and soil systems.

The action(s) that have or will be undertaken to mitigate any environmental harm arising from the non-compliance.

- Where no samples taken: a sampling calendar has been developed and implemented for staff to reference.
- Where SW sites not flowing: Pictures to be taken as evidence of attempt to sample when surface water sites are dry during a rain event if proposing to use alternative sites for sampling.
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Corrective actions that have or will be undertaken to ensure the non-compliance does not reoccur.

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- Exceedances in GW: The bore network is proposed to be surveyed by January 2026 to determine ground water flows.

If no action was taken, why no action was taken.

Section 4. Signature and Certification

This declaration must only be signed by a person(s) with the legal authority to sign it. The ways in which the application may be signed, and the people who may sign the application, are set out in the categories below.			
If the licence holder is:	Check	The application must be signed and certified by one of the following:	
An individual	☐	The individual.	
A partnership	☐	A partner.	
A company	☐	The common seal being affixed in accordance with the <i>Corporations Act</i> , or	
	☐	Two directors, or	
	☐	A director and a company secretary, or	
	☐	If a proprietary company that has a sole director who is also the sole company secretary – by that director.	
A public authority	☐	The Chief Executive Officer (CEO) of the public authority, or	
	☐	By a person delegated to sign on the public authority's behalf in accordance with its legislation (Please note: a copy of the relevant instrument of delegation must be attached to this application).	
I/We hereby declare that the information provided in this Annual Return and accompanying documents is to the best of my/our knowledge, true and correct.			
Signature		Signature	
Name (printed)	David Williams	Name (printed)	Mick Burns
Position	Director	Position	Director
Date	19 December, 2025	Date	19 December, 2025
Seal (if signing under seal):			

Return the completed signed form to environmentalregulation@nt.gov.au