



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:	L4533/1967/15	Licence file number:	DER2015/00597
Licence holder name:	Cockburn Cement Limited		
Trading as:	Cockburn Cement Limited		
ACN:	008 673 470		
Registered business address:	Level 1, 157 Grenfell Street, Adelaide SA 5000		
Reporting period:	01 / 01 / 2021 to 31 / 12 / 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)

- ☐ 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 43 – Cement or Lime Manufacturing	<2,400,000 tonnes
Category 12 – Screening etc. of Material	<1,000,000 tonnes
Category 61A – Solid Waste Facility	<5,000 tonnes
Category 63 – Class I Inert Landfill	<247,500 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
Not applicable	Not applicable

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:	7	Date(s) of non-compliance:	April 2021 September 2021 October 2021
Details of non-compliance:			
CEMS data availability was below required availability for the months above mentioned.			
Kiln	Parameter	Month	% Data Availability
5	Particulates, Flowrate, NOx, TRS, CO & O ₂	October 2021	89
6	SO ₂	April 2021	89
6	NOx, TRS, CO & O ₂	September 2021	81
6	SO ₂	September 2021	82
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 evidence of environmental impact.			
Cause (or suspected cause) of non-compliance:			
<p>K6 April - Various intermittent communication errors.</p> <p>K6 September – The analyser supply line was found to be blocked resulting in invalid measurements for NOx, CO, SO₂, CO and O₂.</p> <p>K5 October – Kiln 5 was used on a campaign basis throughout 2021 which resulted in reduced available kiln hours. Lost time due to the normal scheduled maintenance and calibrations therefore had a higher impact on the total data availability.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>April – The probe controller was inspected and serviced prior to returning to normal operation.</p> <p>September – Supply line was replaced.</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: 28/05/2021, 28/10/2021 and 28/11/2021	

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:	9	Date(s) of non-compliance:	December 2021
Details of non-compliance:			
Kiln 5 offline during scheduled CEMS Relative Accuracy Test Audit (RATA) in Q4 2021.			
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 environmental impact.			
Cause (or suspected cause) of non-compliance:			
Kiln 5 was used on a campaign basis through H2 2021, which resulted in challenges in aligning kiln operation with stack tester availability.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
CCL to continue to liaise with stack tester to schedule maintenance tasks based on forecasted kiln operations.			
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: / /	
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:	13	Date(s) of non-compliance:	December 2021
Details of non-compliance:			
Stack testing of Kiln 5 could not be undertaken in Quarter 4 due to Kiln being offline.			
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 evidence of any environmental impact.			
Cause (or suspected cause) of non-compliance:			
Kiln 5 was used on a campaign basis through H2 2021, which resulted in challenges in aligning kiln operation with stack tester availability.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
CCL to continue to liaise with stack tester to schedule stack testing events based on forecasted kiln operations.			
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: / /	
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			

Department of Water and Environmental Regulation

Condition no:	14	Date(s) of non-compliance:	21/01/21	
Details of non-compliance:				
Emissions exceeded the specified limits				
Discharge Point	Date	Time	Parameter	Particulate Matter recorded (mg/m ³)
Kiln 5	21/01/21	10:00	PM	384
		11:00		528
		12:00		528
		13:00		194
<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>No evidence of any environmental impact.</p>				
Cause (or suspected cause) of non-compliance:				
<p>Urgent works were being undertaken on Kiln 5 flue stack to repair a fitting at the time of the exceedance. This work dislodged scale that fell down inside the flue stack affecting the PM reading, causing concentrations read at the monitor that were not reflective of actual PM emissions.</p>				
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:				
<p>A visual inspection was carried out that confirmed there were no visual emissions of PM from Kiln 5 during this period.</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: 12 / 02 / 2021	
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:	24 (a)	Date(s) of non-compliance:	February 2021, April 2021, June 2021, August 2021, October 2021 and December 2021
Details of non-compliance:			
All BAM manufacturer's recommended maintenance tasks may have been carried out but were not recorded by the manufacturer's technician.			
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 evidence of environmental impact.			
Cause (or suspected cause) of non-compliance:			
An absence of records of completion of some maintenance tasks on the above mentioned, scheduled service dates.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
CCL is consulting with the manufacturer's maintenance department to revise maintenance report templates to ensure future servicing tasks are all clearly documented.			
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: / /	
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:	25	Date(s) of non-compliance:	September 2021 & October 2021
Details of non-compliance:			
Month	Monitor	% Data Availability	
September	Quarry OSIRIS	85	
October	North B BAMS	87	
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 evidence of any environmental impact.			
Cause (or suspected cause) of non-compliance:			
September – A pump failure on the meteorological station (Quarry OSIRIS) led to data unavailability. October – Following the annual service on North B BAMS unit, a communications cable became loose. The issue was not immediately identified resulting in data loss.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
September – The pump was replaced, instrument checked and returned to normal operations. October – The system alarm notified the maintenance technician, who reported to site to rectify the issue. The instrument was returned to normal operations.			
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: 28/10/2021 and 28/11/2021	
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:	26	Date(s) of non-compliance:	As tabulated below
Details of non-compliance:			
Ambient dust emissions from the Premises exceeded the limits on the following dates:			
Monitoring Location	Date	Average PM10	
AM1 West	02/01/21	73	
AM1 West	03/01/21	59	
AM3 North	12/01/21	51	
AM1 West	15/01/21	68	
AM3 North	03/03/21	56	
AM2 South	15/03/21	53	
AM2 South	19/03/21	55	
AM2 South	10/04/21	57	
AM2 South	11/04/21	55	
AM2 South	15/05/21	60	
AM4 East	27/07/21	52	
AM2 South	16/08/21	69	
AM2 South	24/08/21	75	
AM3 North	30/11/21	68	
AM3 North	1/12/21	61	
AM3 North	02/12/21	52	
AM3 North	5/12/21	51	
AM1 West	7/12/21	57	
AM2 South	8/12/21	81	
AM2 South	09/12/21	51	
AM2 South	25/12/21	58	
AM2 South	26/12/21	84	
AM2 South	27/12/21	54	
AM3 North	31/12/21	52	
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 evidence of any environmental impact.			
Cause (or suspected cause) of non-compliance:			

Fugitive dust emissions.	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
Where appropriate the management actions as per Table 14 were undertaken. An improvement project to install additional sprinkler networks around the LKD is being implemented. Sprinklers have been installed on material bunker areas.	
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	Dates: 04/01/21, 11/01/21, 13/01/21, 18/01/21, 03/03/21, 16/03/21, 22/03/21, 12/04/21, 29/04/21, 18/05/21, 28/07/21, 25/08/21, 11/11/21, 02/12/21, 07/12/21, 09/12/21, 29/12/21 and 04/01/22.
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:	29	Date(s) of non-compliance:	As tabulated below
Details of non-compliance:			
Daily inspection may not have taken place on the below listed dates.			
Date	Date	Date	
13/07/21	29/07/21	02/08/21	
17/08/21	31/08/21	02/10/21	
07/11/21	10/11/21	11/11/21	
12/11/21	02/12/21	13/12/21	
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 evidence of any environmental impacts.			
Other visual inspections were carried out on the above-mentioned dates.			
Cause (or suspected cause) of non-compliance:			
An absence of written records of visual inspection on the above-mentioned dates.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
CCL is investigating using direct electronic input of daily inspections instead of written records to prevent possible loss of records.			
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: / /		
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:	32	Date(s) of non-compliance:	July 2021
Details of non-compliance:			
Community website lost BAMS monitoring network feed during a transfer to new webhost service provider.			
Monitor	Parameter	Estimated Downtime	
AM1 West	PM	8 days	
AM2 South	PM	8 days	
AM3 North	PM	8 days	
AM4 East	PM	8 days	
AM5 North B	PM	8 days	
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 evidence of any environmental impact.			
No data loss. Data captured and submitted to DWER as part of monthly reporting requirements.			
Cause (or suspected cause) of non-compliance:			
The transfer of domain management to a new service provider, resulted in a delay of handover of domain access rights from one provider to the other.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
CCL liaised with domain management providers to expedite resolution and resume live data feed.			
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: / /	
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:	39	Date(s) of non-compliance:	January 2021
Details of non-compliance:			
Groundwater monitoring was not undertaken in accordance with Table 17.			
Date	Monitoring Bore	Parameter	
January 2021	Shell Sand Stockpile: SS1 (BH17)	Standing Water Level, Temperature, Electrical Conductivity, Total Dissolved Solids and pH	
November 2021	E-S	Standing Water Level, Temperature, Electrical Conductivity, and pH	
November 2021	E-I	Standing Water Level, Temperature, Electrical Conductivity, and pH	
November 2021	E-D	Standing Water Level, Temperature, Electrical Conductivity, and pH	
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 evidence of environmental impact.			
Cause (or suspected cause) of non-compliance:			
BH17 – could not be sampled due to a blocked downpipe. E-S, E-I and E-D – the nested bore comprising of shallow, intermediate and deep monitoring pipes was inaccessible due to a fallen tree blocking access to monitoring location.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The blocked downpipe in BH17 resolved itself by the following monitoring program. The track cleared and access restored.			
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: / /	
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:	42	Date(s) of non-compliance:	30/01/21
Details of non-compliance:			
Responses to two complaints were not within the relevant time period.			
Complaint Number	Date / Time Reported	Actual Response Time (hrs)	
CC-004840	26/01/21 20:10	92:04	
CC-004917	29/05/21 13:33	119:02	
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 evidence of environmental impact.			
Cause (or suspected cause) of non-compliance:			
CC-004840 – The migration of email profiles to a cloud server resulted in the Community inbox being inaccessible to allow for a response within the required timeframe.			
CC-004917 – Human error.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
All complaints received a response.			
Review of complaints management processes.			
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: / /	
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:	44	Date(s) of non-compliance:	3/05/2021, 16/08/2021, 02/12/2021 & 09/12/2021
Details of non-compliance:			
Notification to the CEO of an exceedance was not reported by 5pm on the next usual working day after becoming aware of the exceedance.			
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 evidence of environmental impact.			
Cause (or suspected cause) of non-compliance:			
03/05/21 – Human error. 16/08/21 – Monitoring equipment automatically emails notification to CCL personnel in the event of an exceedance. Following personnel changes in August 2021, there was a delay in set up of notification distribution list which resulted in an exceedance not being reported until the 16 th of August 2021 as part of the monthly report. 02/12/21 and 09/12/21 – Delays in reporting experienced during the onboarding and training of new CCL personnel.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
The distribution list for the automatic email notifications was updated. Daily checks of monitoring data were implemented. Data collection, analysis and reporting protocol improvements have been implemented to streamline process and prevent future notification delays.			
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: 28/05/2021, 28/08/2021 and 28/12/2021	

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.

Signature ² :		Signature:	
Name: (printed)		Name: (printed)	
Position:		Position:	
Date:	28 March 2022 9:32 AM ACDT	Date:	28 March 2022 11:03 AM ACDT
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.