



Government of **Western Australia**
Department of **Water and Environmental Regulation**

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:	DER2015/000597
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 / 2020 to 31 / 12 / 2020		

Section B – Statement of compliance with licence conditions
Did you comply with all of your licence conditions during the reporting period? (please tick the appropriate box)
<input type="checkbox"/> Yes – please complete: <ul style="list-style-type: none"> section C; section D (if required); and sign the declaration in Section F.
<input checked="" type="checkbox"/> No – please complete: <ul style="list-style-type: none"> section C; section D (if required); section E; and sign the declaration in Section F.

Section C – Statement of actual production	
Provide the actual production quantity for this reporting period. Supporting documentation is to be attached.	
Prescribed premises category	Actual production quantity
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	<5000 tonnes
Category 63 – Class I Inert Landfill	<247,500 tonnes

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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

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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:	February 2020 August 2020
Details of non-compliance:			
Kiln	Parameter	Month	Data Availability %
5	NOx	February	87%
	SO2		88%
6	NOx, SO2, TRS, O2, CO	August	88%
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:			
February – Data gaps followed by instrument stabilization, logger fault, probe controller fault, unscheduled maintenance (calibration following probe pump rebuild). August – Solid state relay (SSR) for the heated sample line failed.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
February – replacement of air conditioning, probe pump rebuilt 18/02/2020. August – replaced solid state relay 01/09/2020.			
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: 27/03/2020 and 25/09/2020	

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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:	19	Date(s) of non-compliance:	05/01/2020 06/01/2020 13/01/2020 14/01/2020 15/01/2020
Details of non-compliance:			
Thermal imagery of the coal stockpile may have been carried out only once on the above-mentioned dates.			
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:			
Absence of written records monitoring 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 written records of monitoring using direct electronic input instead of paper.			
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: / /		

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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:	25	Date(s) of non-compliance:	As per below
Details of non-compliance:			
Month	Monitor	Data Availability %	
January	AM4 East	81%	
March	AM4 East	86%	
October	AM1 West	86%	
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:			
January and March, the AM4 East was vandalised.			
October the AM1 West had both the yearly maintenance and a 72hr background test performed in the same month.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
January and March the vandalism was reported to the Police and CCL replaced what was vandalised. Additional security measures were also implemented at the AM4 East unit.			
CCL discussed with the maintenance contractor regarding timing of routine maintenance/checks to ensure data availability is not affected.			
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: 28/02/20, 28/04/20 and 27/11/20	

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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:	26	Date(s) of non-compliance:	As per below
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Details of non-compliance:

The 24-hr ambient monitoring limit was exceeded on the following dates:

Monitoring Location	Date	Average PM10
AM3 North	01/01/2020	59
AM3 North	08/01/2020	88
AM4 East	09/01/2020	79
AM3 North	09/01/2020	129
AM3 North	14/01/2020	51
AM2 South	03/02/2020	53
AM5 North B	09/02/2020	220
AM2 South	09/02/2020	50
AM2 South	18/02/2020	55
AM2 South	27/02/2020	56
AM2 South	28/02/2020	55
AM2 South	07/04/2020	61
AM2 South	05/06/2020	66
AM4 East	19/09/2020	51
AM2 South	25/10/2020	55
AM3 North	08/12/2020	66
AM2 South	10/12/2020	54
AM3 North	16/12/2020	70
AM3 North	17/12/2020	56
AM3 North	18/12/2020	53
AM2 South	23/12/2020	53

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.

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Section E – Details of non-compliance with licence condition	
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:	
<p>Where applicable the use of management actions as per Table 14 on EPL4533/1967/15 were implemented.</p> <p>Improvement project was scoped and commenced rollout in 2020 to install additional sprinkler networks around the LKD and material bund areas.</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: 03/01/20, 09/01/20, 10/01/20, 15/01/20, 04/02/20, 10/02/20, 19/02/20, 28/02/20, 03/03/20, 28/03/20, 08/04/20, 28/05/20, 08/06/20, 28/07/20, 21/09/20, 26/10/20, 28/10/20, 27/11/20, 09/12/20, 11/12/20, 17/12/20, 18/12/20, 21/12/20, 24/12/20, 28/01/21

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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:	27	Date(s) of non-compliance:	As per below
Details of non-compliance:			
Visual inspection may not have taken place on the below mentioned dates/times:			
Date/Time		Date/Time	
05/01/2020 22:00		17/02/2020 23:00	
14/01/2020 07:00		23/02/2020 14:00	
20/01/2020 04:00		14/03/2020 03:00	
20/01/2020 09:00		25/10/2020 09:00	
21/01/2020 20:00		25/10/2020 10:00	
02/02/2020 10:00		11/12/2020 10:00	
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:			
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 written records of monitoring using direct electronic input instead of paper.			
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: 28/02/20, 28/03/20, 27/11/20 and 28/01/21	

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Section E – Details of non-compliance with licence condition			
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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:	28	Date(s) of non-compliance:	As per below
Details of non-compliance:			
Management actions may not have been taken on the following dates and times:			
Date/Time		Date/Time	
05/01/2020 22:00		25/10/2020 09:00	
14/01/2020 07:00		25/10/2020 10:00	
20/01/2020 04:00		06/12/2020 13:00	
20/01/2020 09:00		06/12/2020 14:00	
21/01/2020 20:00		06/12/2020 15:00	
02/02/2020 10:00		11/12/2020 10:00	
17/02/2020 23:00		18/12/2020 13:00	
23/02/2020 14:00		18/12/2020 14:00	
14/03/2020 03:00		18/12/2020 15:00	
24/10/2020 15:00		27/12/2020 07:00	
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.			
Cause (or suspected cause) of non-compliance:			
Absence of written records of management actions for the above-mentioned dates and times.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
CCL is investigating using written records of monitoring using direct electronic input instead of paper.			
Improvement project and maintenance works have been scoped to implement further dust suppression equipment. These works are anticipated to be completed in 2021.			
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: 28/02/20, 28/03/20, 28/04/20, 27/11/20 and 28/01/21	

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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:	39	Date(s) of non-compliance:	As per below
Details of non-compliance:			
pH monitoring was not able to be performed during the following monthly monitoring periods:			
Monitoring Bore	Parameter	Month	
Bore Z(R)	pH	January	
		February	
		March	
		April	
Bore I2		June	
		July	
		August	
		November	
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:			
Blockage or casing kink - unable to fit multi probe or single pH probe.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Bore Z(R) was redrilled and pH monitoring continued from May 2020.			
CCL investigated and purchased a small gauge pH probe that would be lowered down the bore past any partial blockages or casing kinks. In October the new pH probe was damaged requiring a replacement which did not arrive till after the November monitoring.			
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: / /	

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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:	42 (a) and (b)	Date(s) of non-compliance:	As detailed below
Details of non-compliance:			
Seven (7) complaints were not responded to within the prescribed 72hrs of receipt, and two (2) complaints were not responded to within the prescribed 10 days of receipt (follow up):			
Complaint Number	Date/Time Reported	Response Time	
CC-004594	03/01/2020 13:00	>72hrs (74hrs 51mins)	
CC-004594	03/01/2020 13:00	>10 days (14 days 2hrs 14mins)	
CC-004629	25/01/2020 13:00	>72hrs (123hrs 11mins)	
CC-004630	25/01/2020 13:30	>72hrs (122hrs 35mins)	
CC-004628	26/01/2020 16:16	>72hrs (95hrs 58mins)	
CC-004627	27/01/2020 14:52	>72hrs (73hrs 24mins)	
CC-004638	07/02/2020 07:30	>72hrs (77hrs 32mins)	
CC-004664	29/03/2020 10:45	>72hrs (76hrs 3mins)	
CC-004676	28/04/2020 12:40	>10 days (15 days 23hrs 56mins)	
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:			
Human error.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
All complaints were responded to.			
Review of complaints management processes.			
Delegated responsibilities to ensure 'out of business hours' coverage.			
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: / /	

Department of Water and Environmental Regulation

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)	Brett Brown	Name: (printed)	Marcus Roland Dean Clayton
Position:	Director	Position:	Company Secretary
Date:	31 March 2021	Date:	31 March 2021
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.