



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:	DER2015/00597
Licence holder name:	Cockburn Cement Limited		
Trading as:	Cockburn Cement Limited		
ACN:	008 673 470		
Registered business address:	Level 4, 151 Pirie Street, Adelaide. SA 5000		
Reporting period:	01 / 01 / 2024 to 31 / 12 / 2024		

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

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Section E – Details of non-compliance with licence condition			
Condition no:	7	Date(s) of non-compliance:	January, February, March
Details of non-compliance:			
As detailed in monthly reports to DWER the following are provided.			
Kiln	Parameter	Month	Data Availability
6	TRS	January	86%
	NO _x , CO, O ₂ , SO ₂ , TRS,	February	87%
6	Flow, NO _x , SO ₂ , TRS, CO, O ₂	March	74%
	PM, Flow		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:			
Kiln 6 CEMS January: Data logging error – TRS analyser experienced UV lamp issue in December 2023, requiring replacement using spare unit. UV lamp issue recurred in January 2024 with no spare unit available resulting in reduced data availability. February: Manual onsite maintenance – line blockages. March: Line blockages obstructing the sample line.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Maintenance of CEMS is completed by an external service provider. Changes in tracking of daily checks of CEMS to better pick up blockages have been implemented and review for stock holdings of critical spares.			
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: 28/02/24, 28/03/24, 28/04/24	

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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:	13	Date(s) of non-compliance:	Q2 2024
Details of non-compliance:			
Kiln 5 stack test was missed during Q2 due to low usage.			
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:			
Kiln 5 was used on a campaign basis throughout 2024, 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 any forecasted kiln 5 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: 26/09/24	

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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:	14	Date(s) of non-compliance:	18/05/24, 19/05/24 and 15/08/24	
Details of non-compliance:				
CCL provided notification of K6 CEMS PM emissions exceedances on various occasions through May and August based on preliminary and raw data extracted from the CEMS. Upon further investigation and data validation, all reported exceedances were found not to have been exceedances and there were no actual non-compliances with condition 14. CCL is including this item in the AACR for completeness and out of an abundance of caution.				
Date	Parameter	Monitor Reading (mg/m ³)	Monitoring Limit (mg/m ³)	Kiln Status
18/05/24 1:00 PM	PM10	78.23	50	KILN OFF
18/05/24 2:00 PM	PM10	74.55	50	KILN OFF
18/05/24 4:00 PM	PM10	52.23	50	KILN OFF
18/05/24 5:00 PM	PM10	73.55	50	KILN OFF
19/05/24 11:00 AM	PM10	60.34	50	KILN OFF
19/05/24 12:00 PM	PM10	57.57	50	KILN OFF
19/05/24 2:00 PM	PM10	82.45	50	KILN OFF
19/05/24 3:00 PM	PM10	126.26	50	KILN OFF
19/05/24 4:00 PM	PM10	64.25	50	KILN OFF
19/05/24 5:00 PM	PM10	58.45	50	KILN OFF
15/08/24 1:00 PM	PM10	146.6	50	KILN ON
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 actual non-compliance and no environmental impact				
Cause (or suspected cause) of non-compliance:				
CCL provided notification in May and August 2024 of various K6 CEMS PM emissions exceedances. These notifications were based on preliminary and unverified data extracted from the CEMS. During the end of month data interrogation and validation process carried out by the CEMS service and maintenance provider, these events were found to have occurred during times of CEMS maintenance and/or with the Kiln offline and therefore did not relate to actual exceedances. There were no actual non-compliances with condition 14.				
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:				
Maintenance of CEMS is completed by an external service provider. CCL is requiring cross check of maintenance activity occurring during the period of any suggested exceedance as part of the process for determining investigation and reporting.				
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: 20/05/24 and 16/08/24		

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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:	18C	Date(s) of non-compliance:	N/A
Details of non-compliance:			
<p>CCL received a total of 292 community interactions relating to its Munster site of which 279 were complaints and 13 general enquiries. Of the complaints, 262 (94%) were related to odour, followed by 16 (5.6%) related to dust and 1 (0.4%) by other concerns. Given these complaints and potential perceptions in respect of odour, CCL includes this item out of an abundance of caution, but does not consider that there has been any unreasonable interference with health, welfare, convenience, comfort or amenity that would constitute any non-compliance with condition 18C.</p>			
<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>			
No actual non-compliance and no environmental impact			
Cause (or suspected cause) of non-compliance:			
For the reasons set out above, CCL does not consider there has been any non-compliance with condition 18C and includes this item out of an abundance of caution, in view of the nature of complaints received.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>CCL has developed a modification to the existing lime manufacturing process called "feed diversion". Feed diversion involves diverting the shellsand into a lower and hotter section of the preheater tower, so that as the odorous compounds are released from the shellsand they are in a hotter environment where the odorous compounds are thermally destroyed.</p> <p>Over the summer of 2023-24, as CCL did not have approval to run feed diversion trials or use feed diversion as part of its business-as-usual process, CCL ran trials of a different odour reduction option, which involved a reduced feed rate during periods where the local residential community was down wind of the Munster Plant.</p> <p>In about August 2024, CCL proactively sought approval from DWER to conduct additional feed diversion trials at the Munster Plant. The purpose of these additional trials is to further review the effectiveness of feed diversion as an odour reduction solution in light of DWER's feedback and to compare it with potential alternative solutions. On 16 December 2024, DWER approved CCL's application for an amended licence. Among other things, the amended licence authorises CCL to undertake further feed diversion trials and imposes on CCL monitoring and reporting requirements.</p> <p>The 2024-25 Feed Diversion Trials commenced in around December 2024. CCL is being assisted in the 2024-25 Feed Diversion Trials by Ektimo (which will assist in undertaking stack testing and conducting field surveys) and Katestone (which is an external expert which will assist with data analysis). After the 2024-25 Feed Diversion Trials finish, CCL will provide a Feed Diversion Monitoring Report to DWER.</p>			

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Section E – Details of non-compliance with licence condition

In addition to feed diversion, CCL has considered other methods of addressing the emission of odour from the Munster Plant. These include the following:

- thermal oxidation, which involves the installation of a piece of equipment called a regenerative thermal oxidiser to incinerate odour-causing particles found in the kiln exhaust emissions;
- increasing stack flow rate, which involves modification of the exhaust stack aimed at improving dispersion of the odour-causing particles in the emissions from the lime kiln;
- bioscrubbing, which is a process that involves scrubbing the raw gas via absorption using a gas scrubber, with the clean air then emitted and the scrubbing water passed through a biological reactor; and
- activated carbon-based odour filtration, which is a physical adsorption process that involves passing raw gas through activated carbon.

CCL intends to compare the results of the 2024-25 Feed Diversion Trials with other alternative options, including those outlined above, as part of its work to identify the best mix of odour solutions.

An update about the 2024-25 Feed Diversion Trials was made available to members of the local community including via CCL's website and via CCL's mailing list. As part of the 2024-25 Feed Diversion Trial, CCL is seeking to monitor the local community's experience of odour. Any feedback received from the local community will be cross-referenced against technical data from the trial. CCL has also held meetings with the local community to raise community awareness about the 2024-25 Feed Diversion Trials

CCL will continue to receive, investigate and deal with complaints in accordance with the conditions of its licence.

Was this non-compliance previously reported to DWER?

☒ Yes, and

☐ Reported to DWER verbally

Date: / /

☒ Reported to DWER in writing

Date: 16/12/2024 (new Licence)

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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:	January, February, May, June, July, December
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Details of non-compliance:

There were 2 instances when the TAFE OSIRIS monitor did not meet the monthly data availability as set out below. The October instance was due to a battery fault requiring replacement. The November instance was due to instrument downtime to carry out its scheduled annual maintenance service.

Month	Location	Data Availability %	Comments
October	TAFE	87	Battery fault, replaced
November	TAFE	89.5	Annual service

The BAM units had a range of times with availability below 90% as set out below:

Month	Location	Data Availability %	Reason
January	West	0	Battery stolen.
February	North B	78	Instrument fault (flow error)
	West	23	Stolen battery replaced
May	East	80	Instrument fault (flow error)
June	North B	42	Intermittent power interruption resulting in instrument instability
July	North B	70	Intermittent instrument fault. Intermittent power interruption resulting in instrument instability
	North	85	
December	South	8	Instrument fault (flow error)

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:

The North B power disruptions relate to growth of native trees above the solar panels, and an action to relocate the solar panels is included.

BAM unit response and reporting actions are undertaken using raw data at the time of the event.

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:

CCL is implementing the following actions:

1. Storage of spare batteries for faster turnaround upon future battery failure.

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Section E – Details of non-compliance with licence condition

2. Relocate North B solar panels for improved power generation and related instrument stability.
3. Review data validation process and reporting.

Was this non-compliance previously reported to DWER?

☒ Yes, and

☐ Reported to DWER verbally

Date:

☒ Reported to DWER in writing

Date: 28/02/24, 28/03/24, 24/06/24, 28/08/24,
28/01/25

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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:	January, February, March, May, June, August, October, November, December
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Details of non-compliance:

Ambient Monitoring Network exceedances:

Monitoring Location	Date	Monitor Reading (µg/m³)	Monitoring Location	Date	Monitor Reading (µg/m³)
BAM East	9/1/24	56	BAM South	10/10/24	63
BAM North	9/1/24	53	BAM West	10/10/24	57
BAM North	21/1/24	53	BAM South	15/11/24	77
BAM East	25/1/24	74	BAM East	15/11/24	55
BAM North	25/1/24	83	BAM South	16/11/24	77
BAM North	4/2/24	58	BAM South	25/11/24	293
BAM South	19/2/24	51	BAM North	25/11/24	82
BAM South	23/2/24	51	BAM East	25/11/24	109
OSIRIS TAFE	16/2/24	51	BAM South	05/12/24	72
OSIRIS Britannia	16/2/24	53	BAM South	6/12/24	64
OSIRIS Coogee	16/2/24	53	BAM South	16/12/24	51
BAM South	2/3/24	65	BAM East	18/12/24	79
BAM North	18/3/24	62	BAM West	18/12/24	52
BAM West	29/4/24	51	BAM North	18/12/24	65
BAM South	08/5/24	73	BAM South	19/12/24	67
BAM South	9/5/24	62	BAM South	19/12/24	58
BAM South	22/5/24	51	BAM South	23/12/24	69
BAM South	23/5/24	59	BAM South	24/12/24	125
BAM South	20/6/24	65	BAM East	24/12/24	81
			BAM North	24/12/24	54

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:

Analysis of the last 3 years of data shows a cyclic pattern to incidents, driven by increased fugitive dust exceedances during summer. Reduction of the coal stockpile along with improved stockpile management and monitoring by operations has resulted in reduced incidents and a safer work environment. Installation of the LKD sprinkler system along with optimised operation of the system has also contributed to dust management site improvements.

Count of atmospheric releases is mainly made up by BAM unit exceedances being 32 in 2022, 30 in 2023 and 32 in 2024. CCL continued to actively manage fugitive emissions during 2024 with use of new predictive weather information and preparation for dusty days by operations. A portion of the exceedances are contributed by dust from off-site sources. Understanding this is the case, there remains a range of Management Actions to further improve control of fugitive

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Section E – Details of non-compliance with licence condition

dust emissions from site, as set out below.

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:

Where appropriate, the management actions stipulated by Table 14 of the licence were undertaken. Over the last 12-months the placement of sprinklers in the field has been improved and an increased use of dust suppressant encouraged.

Retraining of personnel on reporting obligations under EP Licence has taken place and will continue to take place to ensure regulatory notifications are identified, investigated and reported within required timeframes.

A two-phase dust response improvement plan is taking place to review the dust response management actions and streamline and automate the administration and reporting through an electronic platform. The program aims to better assess and improve operational actions performed to provide clearer escalation action response across the monitoring units. The platform uses site air quality information and weather intelligence to provide a predictive response plan which reduces reactive operational effort.

Phase 1 involves the setup of the platform by enabling data transfer of the relevant BAM and OSIRIS units, weather and process information input allowing predictive response measures to be assessed and alerted to operations. The development of automated investigation reports for dust, odour and noise are also in progress. Phase 1 has mostly been completed.

Phase 2 will involve a detailed data assessment of the air quality units that may re-configure the trigger action response plan in collaboration with operations to ensure actions are practical and effective. Phase 2 includes setting up streamlined actions reporting and subsequent capability to automatically generate monthly reports and operator training.

Was this non-compliance previously reported to DWER?

☒ Yes, and

<input type="checkbox"/> Reported to DWER verbally	Date: / /
<input checked="" type="checkbox"/> Reported to DWER in writing	Date: 10/1/24, 31/1/24, 5/2/24, 20/2/24, 26/2/24, 5/3/24, 19/3/24, 9/05/24, 10/5/24, 23/5/24, 24/5/24, 21/6/24, 11/10/24, 18/11/24, 26/11/24, 6/12/24, 9/12/24, 17/12/24, 19/12/24, 20/12/24, 24/12/24 and 27/12/24

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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:	February, April, July, August, September, October, November, December.
Details of non-compliance:			
Groundwater monitoring was not undertaken in accordance with Table 17.			
Date	Monitoring Bore	Reason	
February – April	I2	Bore data logging equipment malfunction	
July	F	Access restrictions	
August – December	I2	Well kinked, resulting in equipment blockage.	
October	MB1	Well obstructed at 15.7mbtoc	
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:			
CCL undertakes a comprehensive Groundwater Monitoring Program which includes monthly, quarterly and annual requirements of its extensive monitoring network. Three monitoring bores were not available for scheduled monitoring due to equipment malfunction, structural obstruction and site access restrictions at the time of monitoring.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Contractual KPIs to be incorporated into Service Agreement with ground water monitoring service provider to include back up monitoring equipment, escalation of issues whilst on site to allow for immediate rectification.			
CCL is also working with Drilling contractor to establish best option to redrill casing.			
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: 28/2/24, 28/3/24, 28/4/24, 28/7/24, 28/8/24, 28/9/24, 28/10/24, 28/11/24, 28/12/24	

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Section E – Details of non-compliance with licence condition					
Condition no:	42	Date(s) of non-compliance:	Per table		
Details of non-compliance:					
A system review identified eleven community complaints which were determined to not have been responded to within the prescribed timeframe.					
System NC Reference	Reported Date	Reported Time	Response Completion Summary	CCL AACR Review of 72hr & 10-day compliance window	AACR Time Compliance Gap
CC-005778	19/01/24	18:40	72 Hour response complete 10 Days response required	Non-compliant > 72hrs	0d, 6hrs, 16min
CC-005791	25/01/24	22:27	72 Hour response complete 10 Days response required	Non-compliant > 72hrs	0d, 13hrs, 25min
CC-005825	17/02/24	14:27	72 Hour response complete 10 Days response required	Non-compliant > 72hrs	0d, 0hrs, 59min
CC-006117	18/08/24	14:02	72 Hour response complete No further response required	Non-compliant > 72hrs	0d, 0hrs, 1min
CC-006147	12/09/24	13:22	72 Hour response complete 10 Days response required	Non-compliant > 10 day	4d, 0hrs, 44min
CC-006148	16/09/24	14:00	72 Hour response complete 10 Days response required	Non-compliant > 10 day	0d, 0hr, 14min
CC-006225	25/10/24	11:40	72 Hour response complete No further response required	Non-compliant > 72hrs	0d, 3hr, 3min
CC-006226	25/10/24	12:09	72 Hour response complete No further response required	Non-compliant > 72hrs	0d, 2hr, 27min
CC-006224	25/10/24	09:42	72 Hour response complete No further response required	Non-compliant > 72hrs	0d, 3hr, 57min
CC-006301	8/12/24	10:59	72 Hour response complete 10 Days response required	Non-compliant > 10 day	0d, 3hr, 11min
CC-006299	8/12/24	10:55	72 Hour response complete 10 Days response required	Non-compliant > 10 day	0d, 3hr, 17min
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:					
Community complaints were not responded to due to manual systems and human error.					
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:					
Training to reduce the system use error and development of automated reporting through specialised dust management software which greatly reduces the time taken to generate investigation reports relating to dust and odour complaints. Automated 72-hr and 10-day					

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compliance checker as part of the centralised database makes tracking and reporting response time much easier.	
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: 28/2/24, 28/3/24, 28/9/24, 28/10/24, 28/11/24, 28/12/24, 28/1/25
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.	

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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:	44	Date(s) of non-compliance:	16/02/24, 29/04/24 and 10/05/24
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Details of non-compliance:

Four (4) ambient monitoring exceedances not reported within prescribed timeframe:

Monitoring Location	Date	Monitor Reading ($\mu\text{g}/\text{m}^3$)	Monitoring Location	Date	Monitor Reading ($\mu\text{g}/\text{m}^3$)
*OSIRIS TAFE	16/2/24	51	BAM South	05/12/24	72
*OSIRIS Britannia	16/2/24	53	BAM South	6/12/24	64
*OSIRIS Coogee	16/2/24	53	BAM South	16/12/24	51
*BAM West	29/4/24	51	BAM North	18/12/24	65

The Condition 45_CEMS Data Availability_May 2024 monthly report submitted on 28/06/24, shows CEMS PM exceedances in the 12:00 to 13:00 period on 10/05/24 of the K5 1-minute data set. These values are related to onsite maintenance carried out by the CEMS service provider while the Kiln was in maintenance mode. These 1 minute data exceedances were not identified at the time and therefore not discussed at the time of reporting. These values are not reflective of an emission exceedance and the entry for 10/5/24 is provided for completeness, but does not represent an actual non-compliance.

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:

Ambient monitoring exceedances not reported within prescribed timeframe due to procedural error.

Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:

Retraining of personnel on reporting obligations under EP Licence to ensure regulatory notifications are identified, investigated and reported within required timeframes.
Improvement to system for predicting, responding and reporting licence limit exceedances.

Was this non-compliance previously reported to DWER?

☐ Yes, and

☐ Reported to DWER verbally

Date: / /

☐ Reported to DWER in writing

Date: / /

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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.

Signature²:

Name: (printed)

Position:

Date:

30 March 2025 | 6:18 PM ACDT

Date:

30 March 2025 | 7:14 PM 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.