



## 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](mailto: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 / 2023 to 31 / 12 / 2023		

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

Section C – Statement of actual production	
Provide the actual production quantity for this reporting period. Supporting documentation is to be attached.	
Prescribed premises category	Actual production quantity
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

<b>Section D – Statement of actual Part 2 waste discharge quantity</b>	
Provide the actual Part 2 waste discharge quantity for this reporting period. Supporting documentation is to be attached.	
<b>Prescribed premises category</b>	<b>Actual Part 2 waste discharge quantity</b>
Not applicable	Not applicable

Department of Water and Environmental Regulation

Section E – Details of non-compliance with licence condition			
Condition no:	5(d)	Date(s) of non-compliance:	March, May, June and August
Details of non-compliance:			
No report on seven occasions in relation to table 10 bottom row.			
What was the actual (or suspected) environmental impact of the non-compliance? <b>NOTE</b> – 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. In fact, following investigation there were no actual emissions but instead a technical fault in the instrument. Refer below in relation to Condition 44.			
Cause (or suspected cause) of non-compliance:			
Given that there was no actual emission no report was made.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Investigate Kiln 5 and 6 procedure response, implement recommended procedural improvements.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	

Section E – Details of non-compliance with licence condition			
Condition no:	7	Date(s) of non-compliance:	August, September, November 2023
Details of non-compliance:			
As detailed in monthly reports to DWER data was made available as follow.			
Kiln	Parameter	Month	Data Availability
5	TRS	August	78%
	NO <sub>x</sub> , CO, O <sub>2</sub> , SO <sub>2</sub> , TRS, PM, Flow, T	November	88%
6	NO <sub>x</sub> & CO	August	52%
	O <sub>2</sub>		55%
	SO <sub>2</sub>		49%
	TRS		34%
	PM		0%
	TRS	September	88%
What was the actual (or suspected) environmental impact of the non-compliance?			
<p><b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.</p>			
No evidence of any environmental impact.			
Cause (or suspected cause) of non-compliance:			
<p><b>Kiln 5 CEMS</b> August – Data logging error resulting in missing data.</p> <p>November – Data logging error resulting in missing data following power issue.</p>			
<p><b>Kiln 6 CEMS</b> August – Sample inlet blockage impacting gas flow. TRS analyser issues with calibration and low nitrogen bottle pressure.</p> <p>September – Inaccurate readings and values. Maintenance visit, cleaning of SO<sub>2</sub> analyser input connections.</p> <p>November – Data transfer error resulting in missing data following power issue.</p>			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
<p>Maintenance service provider contacted to carry out inspection and rectification.</p> <p>Maintenance service agreement extended to include weekly physical inspection of CEMS units.</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: 28/08/23, 28/09/23 & 28/12/23	

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:	April to December
Details of non-compliance:			
As detailed in monthly reports to DWER, monitoring data was not available for a BAM unit from April to December 2023.			
What was the actual (or suspected) environmental impact of the non-compliance? <b>NOTE</b> – 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:			
West BAM's battery was stolen in April 2023, replaced and then stolen again in June 2023.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
A dedicated sea container has been designed, fabricated and installed to house the BAMS infrastructure and ancillary equipment whilst maintaining monitoring integrity. Security improvements implemented required engineering design, fabrication of fit for purpose sea container and civil works. Upon installation of the sea container, it was also identified other ancillary parts had been stolen from the unit, resulting in further delays while the parts were sourced and installed.			
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: 25/05/23	

Section E – Details of non-compliance with licence condition			
Condition no:	26	Date(s) of non-compliance:	January, February, March, April, May, June, July, September, October, November and December
Details of non-compliance:			
Ambient dust emissions were as follows on the dates below. Following investigation, two were excluded as being related to local bushfire and not emissions from the premises.			
Monitoring Location/Station	Date (* exceedance reported late)	1hr Average PM <sub>10</sub> (Limit 50mg/m3)	
East	06/01/23	53	
North	07/01/23	55	
East	16/01/23	69	
North	16/01/23	95	
West	18/01/23	52	
South	04/02/23	56	
South	21/02/23	57	
East	21/02/23	55	
East	23/02/23	78	
North	23/02/23	80	
West	28/02/23	58	
South	01/03/23	52	
South	08/03/23	63	
South	19/04/23	72	
South	20/04/23	66	
South	21/04/23	59	
South	22/04/23	70	
South	17/05/23	55	
South	18/05/23	73	
South	19/05/23	63	
South	03/06/23	55	
South	15/07/23*	58	
South	27/09/23	51	
South	16/10/23*	58	
South	22/11/23	55	
South	26/11/23	53	
East	07/12/23	57	
North	08/12/23*	58	
East	08/12/23*	58	
South	08/12/23*	92	
North	17/12/23	62	
East	17/12/23	79	
What was the actual (or suspected) environmental impact of the non-compliance?			
<b>NOTE</b> – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
No evidence of environmental impact.			

Department of Water and Environmental Regulation

Cause (or suspected cause) of non-compliance:	
Fugitive dust emissions from inside and outside the Premises.	
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 were undertaken.	
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: 10/01/23, 18/01/23, 20/01/23, 06/02/23, 23/02/23, 24/02/23, 02/03/23, 10/03/23, 21/04/23, 01/05/23, 19/05/23, 22/05/23, 06/06/23, 23/08/23, 29/09/23, 19/10/23, 24/11/23, 28/11/23, 11/12/23 and 18/12/23, 28/01/24

Section E – Details of non-compliance with licence condition			
Condition no:	42(a)	Date(s) of non-compliance:	TBC
Details of non-compliance:			
CCL responded to 19 community complaints within the following timeframes.			
Complaint	Date complaint made	Date call back	No. Days
CC-005740	11/12/2023		Missed
CC-005705	19/11/2023	05/12/2023	16
CC-005521	26/04/2023	30/04/2023	4
CC-005657	30/10/2023	03/11/2023	4
CC-005674	06/11/2023	10/11/2023	4
CC-005679	06/11/2023	10/11/2023	4
CC-005680	06/11/2023	10/11/2023	4
CC-005681	06/11/2023	10/11/2023	4
CC-005724	01/12/2023	05/12/2023	4
CC-005725	01/12/2023	05/12/2023	4
CC-005742	11/12/2023	15/12/2023	4
CC-005709	24/11/2023	29/11/2023	5
CC-005716	30/11/2023	05/12/2023	5
CC-005723	01/12/2023	06/12/2023	5
CC-005717	29/11/2023	05/12/2023	6
CC-005715	30/11/2023	06/12/2023	6
CC-005710	29/11/2023	06/12/2023	7
CC-005712	29/11/2023	06/12/2023	7
CC-005714	29/11/2023	06/12/2023	7
What was the actual (or suspected) environmental impact of the non-compliance? <b>NOTE</b> – 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 not responded to due to time constraints.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
From July date CCL has used answering hotline services where all phone calls are answered by a person and details taken at the time of the call. CCL is working to streamline response processes.			
Was this non-compliance previously reported to DWER?			



Department of Water and Environmental Regulation

<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.	

Section E – Details of non-compliance with licence condition			
Condition no:	44	Date(s) of non-compliance:	January, March, May, July, August and December
Details of non-compliance:			
Five ambient monitoring exceedances not reported within prescribed timeframe , marked with an * in Condition 26.			
Seven CEMS PM exceedances were not reported within prescribed timeframe although data was provided at the end of each month. After investigation, the limit exceedances are technical with no emission and were due to instrument maintenance or data logging, not representative of an emission exceedance.			
	<b>Kiln Status</b>	<b>PM Reading (mg/m3) (50mg/m3, 60 min average limit)</b>	<b>Finding</b>
<b>Kiln 5</b>			
21/05/23 03:00	Kiln HEATING, no feed	61.07	Instrument maintenance
08:00	Kiln HEATING, no feed	71.72	Instrument maintenance
05/06/23 22:00	Kiln HEATING, no feed	56.54	Instrument maintenance
<b>Kiln 6</b>			
23/3/23 14:00	Kiln OFF	96.74	Data transfer
15:00	Kiln OFF	99.51	Data transfer
10:00	Kiln OFF	76.69	Data transfer
29/8/23 14:00	Kiln OPERATING	65.74	Instrument maintenance
What was the actual (or suspected) environmental impact of the non-compliance?			
<b>NOTE</b> – 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 as no emission occurred.			
Cause (or suspected cause) of non-compliance:			
Ambient monitoring exceedances not reported within prescribed timeframe due to time constraints. CEMS PM exceedance not reported within prescribed timeframe due to procedural gap.			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Investigate CEMS procedure response and implement improvements to include scenario of non-emission.			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	

**Section F – Declaration**

I / We declare that the information in this Annual Audit Compliance Report is true and correct and is not false or misleading in a material particular<sup>1</sup>.

I / We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation’s (DWER) website.

Signature <sup>2</sup> :	[Redacted]	Signature:	[Redacted]
Name: (printed)	[Redacted]	Name: (printed)	[Redacted]
Position:	Chief Financial Officer	Position:	Company Secretary
Date:	28 March 2024   06:04 AWST	Date:	28 March 2024   06:52 AWST
Seal (if signing under seal):			

<sup>1</sup> It is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give information on this form that to their knowledge is false or misleading in a material particular.

<sup>2</sup> 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.