



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 / 2025 | to | 31 / 12 / 2025 |
| 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 | <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: | 5 and 8 | Date(s) of non-compliance: | Per table |
| Details of non-compliance: | | | |
| As detailed in monthly reports to DWER the following are provided. | | | |
| Kiln | Parameter | Month | Data Availability |
| 5 | NOx, CO, O2, SO2, TRS | March | 67% |
| | TRS | Aug | 45% |
| | | Nov | 0% |
| 6 | NOx, CO, O2, SO2 | June | 55% |
| | TRS | July | 89.9% |
| | | | |
| | NOx, CO, O2, SO2, PM, Flow | Nov | 83% |
| | TRS | Dec | 63% |
| 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 has been included for completeness. There was no production on kiln 5 during 2025 and CEMS' low data availability occurred during short periods of heating mode when the kiln burner is used as part of maintenance without any feed. | | | |
| Kiln 6 | | | |
| June and July | Unavailable data due to issue in the calibration system. | | |
| August | Data logging error – Span drift due to UV lamp instability | | |
| November | Data logging error – Span drift due to calibration and missing data due to hard drive failure. | | |
| December | Data invalid due to loose wire connection. | | |
| Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance: | | | |
| In 2024 CCL undertook review of CEMS monitoring and implemented strategic changes to maintenance provider to improve. This resolved non-conformance observed in 2024, but new mechanisms related to spare parts and stock availability occurred in 2025. Actions implemented include a monthly review to confirm stock levels and requiring clearer handover communications. | | | |
| 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: 28/03/25, 27/06/26, 28/07/26, 28/08/25, 28/11/25, 19/12/25 | |
| 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: | 23 | Date(s) of non-compliance: | June |
| Details of non-compliance: | | | |
| Monitoring Location | Data availability | | |
| South | 86% | | |
| North B | 61% | | |
| 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: | | | |
| Monitoring Location | Cause | | |
| South | Intermittent power interruption and instrument stabilization | | |
| North B | Intermittent instrument fault - tape errors | | |
| Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance: | | | |
| The South BAM unit was replaced with a temporary rental unit, and the original unit was sent for repair. A generator was installed at the North B station to address reduced solar charging capacity during the winter period. There were no adverse effects from these events. | | | |
| 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: 28/7/25 | |

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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: | 24 | Date(s) of non-compliance: | | January, February, March, April, May, June, July, August, October, November, December | |
| Details of non-compliance: | | | | | |
| Ambient Monitoring Network exceedances: | | | | | |
| Monitoring Location | Date | Monitor Reading (µg/m ³) | Monitoring Location | Date | Monitor Reading (µg/m ³) |
| South and East BAM | 7/1/25 | 57 | South BAM | 15/5/25 | 60 |
| South BAM | 22/1/25 | 60 | South BAM | 16/5/25 | 54 |
| South BAM | 23/1/25 | 53 | West BAM | 20/5/25 | 51 |
| South BAM | 30/1/25 | 54 | South BAM | 21/5/25 | 95 |
| South BAM | 3/2/25 | 117 | South BAM | 7/6/25 | 51 |
| South BAM | 5/2/25 | 56 | South BAM | 24/6/25 | 67 |
| South BAM | 6/2/25 | 53 | South BAM | 9/7/25 | 80 |
| South and East | 11/2/25 | 77 and 83 | South BAM | 16/7/25 | 67 |
| South BAM | 13/2/25 | 52 | South BAM | 16/8/25 | 64 |
| South BAM | 6/3/25 | 68 | South BAM | 28/10/25 | 57 |
| South BAM | 19/3/25 | 56 | East BAM | 23/11/25 | 63 |
| South BAM | 27/3/25 | 53 | South BAM | 1/12/25 | 52 |
| South BAM | 30/3/25 | 111 | East BAM | 4/12/25 | 59 |
| South BAM | 4/4/25 | 54 | South BAM | 20/12/25 | 58 |
| South BAM | 5/4/25 | 67 | | | |
| South BAM | 9/4/25 | 74 | | | |
| South BAM | 10/4/25 | 102 | | | |
| South BAM | 11/4/25 | 63 | | | |
| South BAM | 16/4/25 | 58 | | | |
| South BAM | 17/4/25 | 126 | | | |
| 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: | | | | | |
| In 2025, BAM units recorded 36 exceedances of the daily PM10 limit. Up to 17 were attributed to external non-CCL dust sources impacting the Southern BAM. | | | | | |
| Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance: | | | | | |
| Operational changes during 2025 to improve dust emissions include the cessation of cement production at the Munster site and relocation of all cement production to the new Kwinana facility. Truck movements have decreased with cement production being moved to Kwinana. Additionally all coal stockpiles were exhausted and feeding of coal as fuel source to the lime kilns was ceased. Coal stockpiles were repurposed and covered with some areas being | | | | | |

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| Section E – Details of non-compliance with licence condition | |
|--|---|
| revegetated. The management actions stipulated by Table 15 of the licence were actioned. | |
| 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: 08/1/25, 23/01/25, 28/01/25, 31/01/25, 04/02/25, 06/02/25, 07/02/25, 12/02/25, 14/02/25, 07/03/25, 20/03/25, 28/03/25, 31/03/25, 07/04/25, 10/04/25, 11/04/25, 14/04/25, 17/04/25, 22/04/25, 16/05/25, 19/05/25, 21/05/25, 22/05/25, 09/06/25, 25/06/25, 10/07/25, 17/27/25, 18/08/25, 29/10/25, 24/11/25, 02/12/25, 05/12/25, 22/12/25 |

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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: | 37 | Date(s) of non-compliance: | January - September |
| Details of non-compliance: | | | |
| Groundwater monitoring was not undertaken in accordance with Table 17. | | | |
| Date | Monitoring Bore | Reason | |
| January - September | I2(D) | I2(D) well casing no longer serviceable | |
| March | MB1 | Probe not able to fit down well due to obstruction | |
| 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. Two monitoring bores were not available for scheduled monitoring due to structural obstruction at the time of monitoring. | | | |
| Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance: | | | |
| I2(D) bore was re-drilled in September 2025, with monitoring data available from October 2025 onward. | | | |
| 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: 31/03/2025 | |

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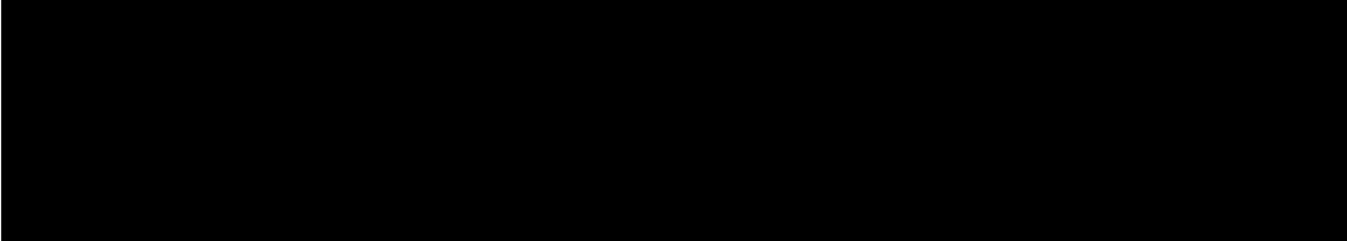
| Section E – Details of non-compliance with licence condition | | | | | |
|--|---------------|----------------------------|---|--|--------------------------------|
| Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period. | | | | | |
| Condition no: | 40 | Date(s) of non-compliance: | March, April, August, November | | |
| 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-006868 | 13/11/25 | 14:31 | 72 Hour response complete, no further response required | Non-compliant > 72hrs | 3d:1hr:28min |
| CC-006734 | 21/08/25 | 15:26 | 72 Hour response complete, 10 Days response required | Non-compliant > 72hrs, >10d | 3d:23hr:29min 0d:18hr:38min |
| CC-006645 | 17/04/25 | 14:20 | 72 Hour response complete, 10 Days response required | Non-compliant > 72hrs, >10d | 1d:23hr:49min 0d:20hr:38min |
| CC-006644 | 17/04/25 | 18:47 | 72 Hour response complete, 10 Days response required | Non-compliant > 72hrs, >10d | 1d:19hr:12min 2d:20hr:11min |
| CC-006560 | 4/03/25 | 09:02 | 72 Hour response complete, no further response required | Non-compliant > 72hrs | 3d, 3hr, 19min. |
| 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: | | | | | |
| Prescribed response time to five community complaints were not met due to time constraints. | | | | | |
| Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance: | | | | | |
| Mitigation actions will focus on further reducing human error through targeted refresher training, aimed at improving data accuracy, timely reporting, and compliance in system processes. Additionally, review of the fact sheet information will be completed to streamline responses. | | | | | |
| Was this non-compliance previously reported to DWER? | | | | | |
| <input type="checkbox"/> Yes, and | | | | | |
| <input type="checkbox"/> Reported to DWER verbally | | | Date: / / | | |
| <input checked="" type="checkbox"/> Reported to DWER in writing | | | Date: 31/ 03/2026/ | | |

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.



| | | | |
|-------------------------------|----------------------------|-------|----------------------------|
| Date: | 31 March 2026 12:01 AWST | Date: | 31 March 2026 14:25 AWST |
| 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.