



26/04/2019

QUARTERLY AUDIT REPORT

DWER OPERATING LICENCE (L4533/1967/15) PUBLISHED 30 MARCH 2015 (EFFECTIVE AS OF 1 APRIL 2012)

LICENCE CONDITION 8

Quarter 4 - 2018

(For the period 1 October to 31 December 2018)

DRAFT FOR CLIENT REVIEW

Cockburn Cement Limited (CCL) was issued with a new operating licence by DWER (L4533/1967/15, published 30 March 2015), effective as of 1 April 2015. As required by this licence, CCL has engaged Emission Assessments Pty Ltd (EAPL) to conduct an independent quarterly audit as specified in Licence Condition 8. This condition requires an external audit of Licence Conditions 4 to 6.

1. AUDIT PROTOCOL

Compliance to the DWER licence conditions has been ascertained by a review of the following:

1. CCL Complaints Register;
2. CCL website (www.cockburncementcommunity.com.au);
3. Weekly Community Feedback Summary.

A 'Stop Light System' code is used to report CCL's compliance to its licence conditions. The criteria for each code are outlined below.

Code	Audit Criteria
Green	Greater than 95% compliance observed in the records audited
Orange	Between 60-95% compliance observed in the records audited
Red	Less than 60% compliance observed in the records audited

REVISION HISTORY		
Version Number	Date Issued	Version Details
1.0	26/04/2019	Final



2. LICENCE REQUIREMENTS AND AUDIT RESULTS

A list of the full licence conditions applicable to this audit period is presented in Section 3 of this report. A summary of the audit results for the period 1 October to 31 December 2018, Quarter Four, on Licence Conditions 4 to 6 is given in the following table.

Licence Condition	Audit Findings	Q4-2018 October November December
4	An audit of CCL's Complaints Register provided to EAPL has shown that, overall, the data entry and record keeping for the Quarter 4 period of 2018 has met the conditions of the licence. A total of 116 complaints were taken for this audit quarter.	
4a	Date and time records for both the complaint and the environmental impact (where stipulated by complainant) have been kept for complaints for Quarter 4 of 2018.	
4b	CCL applies registration numbers both to complaints received by CCL, as well as through the DWER. For the current audit quarter CCL have met the requirements of this condition.	
4c	Location records for the complaint (where possible) have been kept for the audit period.	
4d	Details of the nature of the environmental impact reported by the complainant have been kept for the audit quarter. During the months of October, November and December 2018, of the 116 registered complaints, 91% (106) related to odour; 9% (11) related to dust; and 1% (01) were characterised as 'Lime Kiln'.	
4e	2 general health effects were noted in the Complaints Register in Quarter 4 of 2018. EAPL are unable to determine if the health concern is related to emissions from CCL. Comments included: (1) Throat irritation; (1) Sore Throat.	
4f	For Quarter 4 of 2018, all complaints specified impact times. Wind direction, wind speed and temperature were recorded for 106 complaints (91%).	
4g	<p>According to the Quarter 4 2018 Complaints Registers from CCL, 1 (1%) of the complaints were likely to be attributable to the CCL Lime Kilns, and 7 (6%) were attributed to Other Sources. The remaining likely sources of the complaints were classified as "Unknown" (93%).</p> <p>No detailed assessment as to the adequacy of the investigations has been made by EAPL.</p>	



Licence Condition	Audit Findings	Q4-2018 October November December
4h	CCL has documented and recorded the actions taken in response to complaints, results of investigations, as well as actions to prevent recurrence for 100% of all Quarter 4 2018 complaints. The CCL Complaints Registers stipulates that no actions can be implemented to prevent recurrence if the impacts were not attributable to CCL or if no specific impact time was stipulated by the complainant. No detailed assessment as to the adequacy of the actions or investigations has been made by EAPL.	
4i	CCL has a system in place to track the time taken to respond to each complainant. If the response time is more than 72 hours (as specified in Condition 5a), this is automatically flagged by the control system.	
5a	According to the Quarter 4 2018 Complaints Registers, CCL received a total of 116 complaints. A review of the records indicates that 113 (97%) of the complaints were responded to within 72 hours.	
5b	According to the Quarter 4 2018 Complaints Registers, 3 (3%) complaints required and received further feedback after CCL's initial 72hr response. No detailed assessment as to the adequacy and specificity of the 10 day feedback has been made by EAPL.	
6	CCL has posted weekly Community Feedback Summaries on the CCL website for this audit quarter.	
8	For the previous quarter period (July to September 2018), CCL have published a quarterly audit report to the website for Quarter 3 2018. This is in accordance with the requirements of the current licence.	

This report was prepared by Emission Assessments Pty Ltd

Authorised By:

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3. LICENCE REQUIREMENTS

Licence Condition 4:

“The licensee shall keep a written record of all complaints received concerning the impact of emissions from the premises for a minimum of 3 years, which shall include but not be limited to:

- a) Date and time both of the complaint and of any environmental impact reported by the complainant;*
- b) A unique registration number;*
- c) Location about which the complaint was made;*
- d) General description of the nature of any environmental impact reported by the complainant to which the complaint relates;*
- e) Whether the complainant reported any adverse health effects;*
- f) Wind direction, wind speed and air temperature at the time of the complaint;*
- g) The likely source(s) of the cause of the complaint;*
- h) Actions taken in response to the complaint including results of any investigations and actions taken to prevent recurrence of the events giving rise to the complaint;*
- i) Time taken to respond to the complaint; and*

In order to evaluate compliance to Licence Condition 4, EAPL were provided with CCL’s Quarter 4 2018 Complaints Registers.

The general contents of these registers were compared to the requirements outlined in Licence Condition 4.

Licence Condition 5:

“Following receipt of a complaint concerning the impact of emissions from the premises:

- a) Within 72 hours of receipt of the complaint, the licensee shall respond to the complainant; and*
- b) Within 10 days of receipt of the complaint the licensee shall provide feedback, including, but not limited to, investigation outcomes and actions taken (if any are appropriate) in relation to the complaint, unless such feedback is not requested by the complainant as a result of the response under (a).”*

In order to evaluate compliance to Licence Condition 5, the Quarter 4 2018 Complaints Register was closely interrogated to determine whether the time requirements outlined in the licence had been met for this quarter.



Licence Condition 6:

“The licensee shall provide to the CEO and publish on the Cockburn Cement Limited website, but 5pm by the first Wednesday of each month, a weekly summary of the information contained in the complaints register required by condition 4 for the preceding month ending on the first Tuesday of each month, excluding the names and addresses of complainants”.

In order to evaluate compliance to Licence Condition 6, EAPL accessed the CCL community website (www.cockburncementcommunity.com.au) each calendar month, or as close to that month as practicable, to determine whether weekly summaries had been posted on the website.

Licence Condition 8:

“The licensee shall publish quarterly on the Cockburn Cement Limited website a report prepared by an accredited independent auditor as to its compliance with conditions 4, 5 and 6”.

In order to evaluate compliance to Licence Condition 8, EAPL accessed the CCL community website (www.cockburncementcommunity.com.au) quarterly to ensure quarterly reports are published on the website.

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