

APPENDIX K

Lamberts North Ash Repository Internal Audit – June 2019

Lamberts North Ash Repository

Internal Audit

22 June 2019

Audit Report		
Audit Summary	<ul style="list-style-type: none"> An Audit was conducted across Mt Pipers operations including a focus on Lamberts North Ash repository against the requirements of EnergyAustralia's environmental management system Audit Findings items are summarised in the adjacent table, and are detailed within the report. 	Audit Findings (see Audit Criteria overleaf, for full description)
		NC-H Non-compliance – High 0
		NC-M Non-compliance – Medium 0
		NC-L Non-compliance – Low 3
		NC-A Administrative non-compliance 0
		C Compliant 0
		NA Not Assessed 0
		O Observation 0
Auditor	Nick Brockman, Ray French	
Audit Date	22 June 2019	

Audit Type	Internal Audit (EMS)	
Audit Method	Desktop sampling and site inspection	
Audit Scope	Requirements of EMS and ISO14001	
Audit Limitations	Broad and limited depth audit: <ul style="list-style-type: none"> - based on presence and absence of required documentation, not degree (or quality) of implementation; - other items 'Not Assessed' due to coverage by previous internal audits; - other items 'Not Assessed' due to no current issues identified; - other items 'Not Assessed' due to no construction activities currently underway; - other items 'Not Assessed' due to project still being in operational phase. 	
Audit Documents	Document Title	Document Reference

Audit Criteria	Risk Level	Colour Code	Description
	High	NC-H	Non-compliance with potential for significant environmental consequences, regardless of the likelihood of occurrence.
	Medium	NC-M	Non-compliance with: <ul style="list-style-type: none"> • Potential for serious environmental consequences, but is unlikely to occur; or • Potential for moderate environmental consequences, but is likely to occur.
	Low	NC-L	Non-compliance with: <ul style="list-style-type: none"> • Potential for moderate environmental consequences, but is unlikely to occur; or • Potential for low environmental consequences, but is likely to occur.
	Administrative non-compliance	NC-A	Only to be applied where the non-compliance does not result in any risk of environmental harm (e.g. submitting a report to government later than required under approval conditions).
	Compliant	C	The intent and all elements of the requirement of the regulatory approval have been complied with.
	Not Assessed	NA	Not assessed.
	Observation	O	Observation, based on identified inconsistency or opportunity for improvement.

Finding		Comments / Evidence
Risks and Obligations not driving the EMS/OHSMS	NC -L	<ul style="list-style-type: none"> The Risk Registers are not current (already identified locally) and are not formally used in the EMS process to inform Obj, Targets & Programs, Training & Awareness, Monitoring & Measurement (Env or OHS) etc The Obligations Register is not exhaustive of the legal HSSE obligations, does not list controls in many instances, and as with Risks, do not inform the EMS/OHSMS processes
Training and Awareness appears to be deficient	NC -L	<ul style="list-style-type: none"> A Training Needs Analysis is not in place to guide the training that is required for each role (already identified locally and required by Enterprise Std) Training does not appear to be formally linked to risks and obligations Instances of Training and Awareness were not provided: <ul style="list-style-type: none"> CEMS monitoring in place for 5 months but operators have not yet been trained in response to alarms Expectations around waste disposal
Environmental Operational Controls not documented	NC -L	<ul style="list-style-type: none"> A consolidated list of the required Environmental Monitoring does not exist. The program is required by multiple documents (licences, approvals etc) and is managed by multiple contractors, but is not consolidated as a plan (as required by the Enterprise Std) The waste management program is not described, including waste streams, disposal requirements and obligations

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