

Aquasol – 2015 Operational Audit and Asset Management System Review

Post-Audit Implementation Plan

Reference (no./year)	Asset System Deficiency	Auditor's recommendation	Management action	Person Responsible	Target Date for Completion
01/2015	<p>Review of Water Bills <i>Water Services Act 2012 Section 27</i> <i>Water Services Code of Conduct (Customer Service Standards) 2013 Clause 18(1) – 18(5)</i> <i>Licence conditions – Clause 5.1 and 5.3</i> Non-compliant – minor impact</p> <p>The licensee must have a written procedure for the review of a bill on the customer's request. Although the written Aquasol's Billing Enquiries procedure is in place, it does not contain all required information. Aquasol's Environmental Co-ordinator advised that no request for review of the water bill had been received during the audit period.</p>	<p>Aquasol should update its Billing Enquiries procedure to include information about:</p> <ol style="list-style-type: none"> what happens if the customer has been undercharged or overcharged; that the customer may, but does not have to, use the licensee's complaints procedure before or instead of applying to the Water Services Ombudsman or making an appeal from, or applying for a review of, the decision that gave rise to the complaint, to the State Administrative Tribunal; and that the licensee must inform the customer of the outcome of a review of the customer's bill as soon as practicable or otherwise less than 15 business days from the day the customer's request for review was received. 	<p>Management to confirm that recommendation has been met</p>	<p>Francisca Haro Environmental Co-ordinator</p>	<p>End of June 2015</p>
02/2015	<p>Next Review of Financial Hardship Policy <i>Water Services Act 2012 Section 27</i> <i>Water Services Code of Conduct (Customer Service Standards) 2013 Clause 26(6)</i> <i>Licence conditions – Clause 5.1 and 5.3</i> Not rated (no activity)</p> <p>Aquasol's Financial Hardship Policy was approved by the Authority on 16 May 2014 and is not due for review until 2019. The requirement to review the policy every 5 years is stated in the policy, however to ensure compliance with this requirement, Aquasol's ERA</p>	<p>Aquasol should update its ERA Commitments To Follow schedule for the Financial Hardship Policy's next review due date.</p>	<p>Management to confirm that recommendation has been met</p>	<p>Francisca Haro Environmental Co-ordinator</p>	<p>Completed</p>

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	Commitments To Follow schedule should be updated for the required policy review due date.				
03/2015	<p>Complaints Procedure <i>Water Services Act 2012 Section 27</i> <i>Water Services Code of Conduct (Customer Service Standards) 2013 Clause 35(3)&(4)</i> <i>Licence conditions – Clause 5.1 and 5.3</i> Non-compliant – minor impact</p> <p>The audit reviewed Aquasol's Complaints Procedure and noted that the procedure covers how complaints are to be lodged and recorded and dispute resolution arrangements. However, it does not provide time limits and methods for responding to complaints in respect of all complaint lodgement options offered. Further, the procedure does not provide for resolving a complaint before the end of the period of 15 business days starting on the day the complaint was received, although this timeframe is stated in the Section 3.3 Resident's Enquiries of the Customer Service Charter. The specific complaints procedures as per the Code of Conduct are also not covered in the procedure.</p>	<p>Aquasol should update its Complaints Procedure to:</p> <ol style="list-style-type: none"> provide for time limits and methods for responding to complaints; provide for resolving a complaint within 15 business days from the day the complaint was received; state that a customer may, but does not have to, use the complaints procedure before or instead of the procedures under the Act i.e. applying to the Water Services Ombudsman or making an appeal from, or applying for a review of, the decision to the State Administrative Tribunal; in addition to an option of applying to the Water Services Ombudsman, list the option of making an appeal from, or applying for a review of, the decision that gave rise to the complaint to the State Administrative Tribunal; and set out the benefits to the customer, in relation to time and costs, if the customer chooses to use the complaints procedure before or instead of the procedures under the Act i.e. Water Services Ombudsman or State Administrative Tribunal. 	Management to confirm that recommendation has been met	Francisca Haro Environmental Co-ordinator	End of August 2015
04/2015	Prescribed Information to be Available in Hardcopy and on	1. Aquasol should publish information about Residential Pricing and Charges	Management to confirm that recommendation has been met	Francisca Haro Environmental Co-	End of July 2015

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	<p>Website <i>Water Services Act 2012 – Section 27 and 95(3)</i> <i>Water Services Code of Conduct (Customer Service Standards) 2013 Clauses 37(1)</i> <i>Licence conditions – Clause 5.1. and 5.3</i> Not rated</p> <p>The licensee must make the “prescribed information” publicly available. The definition of “publicly available” per Clause 3 of the Water Services Code of Conduct is website and hardcopy.</p> <p>The auditor noted that the majority of the “prescribed information” set out in Section 37 of the Code is available to customers in the Customer Service Charter published on Aquasol’s website and in hardcopy upon request. The building services fees and charges are also published on Aquasol’s website and provided in hardcopy in the Builder’s Application Package.</p> <p>The auditor noted that following “prescribed information” is not publicly available to customers:</p> <ul style="list-style-type: none"> • Information about Residential Pricing and Charges and about the services provided by Aquasol under clause 36 of the Code is provided in hardcopy to the residents but is not published on Aquasol’s website; and • Information under section 95(3), re the supply of water cannot be cut off to an occupied dwelling unless the occupier agrees and about sustainable use of water is 	<p>and about the services provided by Aquasol under clause 36 of the Code on its website.</p> <p>2. Aquasol should update its Customer Service Charter for information under section 95(3), re the supply of water cannot be cut off to an occupied dwelling unless the occupier agrees and about sustainable use of water.</p>		ordinator	

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	not publicly available to customers on Aquasol's website or in hardcopy.				
05/2015	<p>Performance and Compliance Reporting</p> <p><i>Water Services Act Section 29</i> <i>Licence Conditions – Specific Clauses – Provision of Information Clauses 5.1 and 16(1)</i></p> <p><i>Non-compliant – minor impact</i></p> <p>In accordance with the Water Compliance Reporting Manual April 2014, Aquasol is required to submit to the Authority:</p> <ul style="list-style-type: none"> Annual performance reports no later than 31 July for the reporting year ending 30 June; and Annual compliance reports by 31 August for the year ending 30 June. <p>The auditor reviewed Aquasol's correspondence with the Authority and the available Compliance and Performance Reports for 2012/13 and 2013/14 and noted the following exceptions:</p> <ul style="list-style-type: none"> The Compliance Report for the year ended 30 June 2014 was submitted on 8 September 2014 rather than by the due date of 31 August 2014. Aquasol was unable to source the Compliance Report for the year ended 30 June 2013 and 	<ol style="list-style-type: none"> Aquasol should ensure that all future Compliance Reports are submitted to the Authority within the timeframes required. Aquasol should keep records of all Compliance reports and reports submissions. Aquasol should update its ERA Commitments To Follow (Based on Water Operating Licence No 42) schedule for the requirement to submit the annual Compliance and Performance Reports and their due dates. 	<p>Management will request a copy of the annual Compliance and Performance Reports submitted to the Authority to confirm correct timeframe</p>	<p>Francisca Haro Environmental Co-ordinator</p>	<p>Dot & 2.- Noted Dot 3.- Completed</p>

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	<p>evidence of its submission to the Authority by the due date within Aquasol's records.</p> <p>The auditor reviewed Aquasol's ERA Commitments To Follow (Based on Water Operation Licence No 42) schedule and noted that the requirement to submit the annual Compliance Report as well as annual Performance Report and their submission due dates is not specifically stated in the schedule.</p>				
06/2015	<p>Compliance Register</p> <p><i>Licence Conditions – Specific Clauses – Provision of Information Clause 5.1 and 16.2</i></p> <p><i>Non-compliant – minor impact</i></p> <p>Section 9.3.2.3 of the Audit and Review Guidelines: Water Licenses July 2014 states that Authority expects licensees to maintain a compliance (or breach) register in respect of their licence conditions.</p> <p>Aquasol's Environmental Co-ordinator advised that they don't keep a compliance register.</p>	<p>Aquasol should maintain a Compliance Breach Register in respect of their licence conditions to ensure that all contraventions of the licence conditions for each financial year are reported to the Authority in the annual Compliance report.</p>	<p>Management to confirm that recommendation has been met</p>	<p>Francisca Haro Environmental Co-ordinator</p>	<p>End of July 2015</p>
07/2014	<p>Internal Policies and Procedures relating to the Licence</p> <p><i>Water Services Act 2012 sections 27, 84(2), 87(2), 90(7), 95(3), 119(2), 122(2), 128(4), 141(1), 142, 143(2)&(3), 144(3), 145(2), 147(3)&(4), 151(1)-(3), 153(2)&(3), 173(4), 174(1)& (3), 175(2)&(5), 176(1), (3)&(4),</i></p>	<p>1. Aquasol should develop and/or update internal procedures with the requirements under the licence water service works, road works, notification to the Authority of general or major</p>	<p>Management to confirm that recommendation has been met</p>	<p>Francisca Haro Environmental Co-ordinator</p>	<p>Dot 1.- End of August 2015</p> <p>Dot 2.- Completed</p>

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	<p>181, 186, 187(1)-(3), 190(4)&(5), 218(2). <i>Water Services Regulations 2012 – Reg. 60(2), 63, 85.</i> <i>Water Services Code of Conduct (Customer Service Standards) 2013 Clauses 13(1)&(2), 14(1), 16(2)-(5), 17(1)&(2), 31, 32, 33, 34(4)&(6).</i> Licence Conditions – Clause 5.1 and 15.1(d)</p> <p style="color: red;"><i>Not rated</i></p> <p>The licence includes compliance obligations in respect of water service works, road works, notification to the Authority of general or major water (service works within 10 business days, termination of water supply, conditions of entry to premises, issue of work order notices or compliance notices, warrants, billing review, under and over charges, memorials, objections and reducing flow rates.</p> <p>Although the audit confirmed these activities had not occurred in the audit period, there are no documented internal procedures that would ensure compliance with these conditions of the licence in future.</p>	<p>water service works within 10 business days, termination of water supply, conditions of entry to premises, issue of work order notices or compliance notices, warrants, billing review, under and over charges, memorials, objections and reducing flow rates. The detailed compliance obligations listed in this report could be used as a reference.</p> <p>2. Aquasol should update its ERA Commitments To Follow (Based on Water Operation Licence No 42) schedule for relevant requirements, such as notification to the Authority within 10 business days of major or general water service works.</p>			

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08/2015 B2	<p>Asset Creation and Acquisition – Update of Legislation</p> <p><i>Ongoing legal/environmental/safety obligations of the asset owner are assigned and understood.</i></p> <p>Section 2.3 of the respective AMPs for potable/non potable water supply and wastewater supply outlines the legislative, environmental and safety requirements. These are monitored by Aquasol's Environmental Co-ordinator.</p> <p>However, the reviewer noted that the Legislative Requirements Section of the AMP for Waste Water Treatment Services (dated May 2013) still refers to the Water Services Act 1995 and the old version of the operating licence and does not reflect the most recent changes to the legislation including Water Services Act 2012, Water Services Regulation 2013 and Water Services Code of Conduct (Customer Service Standards) 2013 as well as changes to the operating licence (new version of the operating licence was issued on 18 November 2013).</p>	<p>The Legislative Requirements Section of the AMP for Waste Water Treatment Services should be updated to reflect the recent changes to the legislative requirements including Water Services Act 2012, Water Services Regulation 2013 and Water Services Code of Conduct (Customer Service Standards) 2013 as well as for the new version of the operating licence issued on 18 November 2013.</p>	<p>Management to confirm that recommendation is met</p>	<p>Francisca Haro Environmental Co-ordinator</p>	<p>End of July 2015</p>
09/2015 B2	<p>Environmental Analysis – Department of Health</p> <p><i>Compliance with statutory and regulatory requirements.</i></p> <p>Regarding specific regulations for drinking water purposes, an application to the Department of Health (DoH) was submitted before water supply system was built. As required by the Authority,</p>	<p>As planned, Aquasol should finalise the MOU with the Department of Health to formalise the water treatment plant's conformance with the Australian Drinking Water Guidelines 2011 and the annual compliance reporting to the Department.</p>	<p>Management to confirm that MOU is finished and agreed</p>	<p>Paul Savage, Technical Director and Francisca Haro, Environmental Co-ordinator</p>	<p>After receiving updated MOU from DoH.</p>

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	<p>a Memorandum of Understanding (MOU) with DoH is required to be entered into. The reviewer reviewed the correspondence between Aquasol and DoH and noted that the implementation of a new MOU with Aquasol was deferred, by mutual agreement, until such time as an MOU can be finalised that is based on the Australian Drinking Water Guidelines 2011.</p> <p>As stated in the AMP for potable/ non potable water supply, all material used that is in contact with drinking water is approved by the "Material and substances in Drinking Water" published by DoH, with exception of the anti-scalant which does not require approval as it will be removed in the final treatment water process.</p> <p>Aquasol's Environmental Co-ordinator advised that the MOU is still under revision by DoH, there is no formal water sampling program, and no annual report has been requested by the DoH.</p>			<p>Brian Labza Senior Policy Officer Department of Health</p>	
10/2015 B2	<p>Asset Operations – Sewerage cartage</p> <p><i>Operational policies and procedures are documented and linked to service levels required.</i></p> <p>For the sewerage service, to serve the initial lots, a small length of gravity sewer has been constructed discharging to a service pit. From this pit, sewage is pumped to a truck and discharged at the Water Corporation Sewerage treatment plant. A company, Lancelin Sands is used to pump out the</p>	<p>Aquasol should put in place a formal contract with the existing or another experienced contractor for the pump out of the sewage collection pit.</p>	<p>Management and administration to agree on contract terms.</p>	<p>Paul Savage, Technical Director and</p> <p>Pili Lydiate, Accounts and Administrations</p>	<p>End of September 2015</p>

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	pit, in response to a request from Aquasol. No formal contract is in place for this activity.				
11/2015 B2	<p>Asset Operations – Update of Asset Register</p> <p><i>Assets are documented in an Asset Register including asset type, location, material, plans of components, and an assessment of assets' physical/structural condition and accounting data.</i></p> <p>The Asset Register for the WTP was sighted. The current WTP Asset Register includes details on:</p> <ul style="list-style-type: none"> ▪ Asset Identification Code; ▪ Description; ▪ Dimensions/ type; ▪ Construction materials/ model; and ▪ Construction date <p>The historical cost information for the assets has not been transferred to the Asset Register but is in the financial system.</p> <p>The asset location is documented in "As Constructed" drawings stored in Aquasol's office (hard copy) and electronically on the network. An asset register for the distribution mains to the sub-division, and reticulation mains and equipment within the sub-division was not provided.</p> <p>The WWTP Asset Register has been developed based on the main WWTP assets to be constructed or acquired on a staged basis. However the</p>	<p>Aquasol should ensure that the distribution mains to the sub-division, and reticulation mains and equipment within the sub-division are documented accurately and completely in the Asset Register.</p>	<p>Management to confirm that all assets mentioned in this reference are documented and completed in Asset Register.</p>	<p>Francisca Haro Environmental Co-ordinator</p>	<p>End of August 2015</p>

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	current sewage assets that are in place re tankering the liquid waste to the Water Corporation's treatment plant are not documented in the Asset Register for Sewage Services.				
12/2015 C2	<p>Asset Maintenance – Documentation of procedures and their completion</p> <p><i>Maintenance policies and procedures are documented and linked to service levels required.</i></p> <p>There is a Monthly General Maintenance Plan for the Water Treatment Plant (WTP) in place. The WTP is automatic apart from some monthly maintenance to refill chemical drums, compile data logged information and undertake sampling. The Monthly General Maintenance Plan only lists the tasks to be undertaken and the performance of the tasks is reliant on the knowledge of the key personnel for example undertake water sampling, calibrate and verify chlorine readings, general maintenance to compressor etc.</p> <p>Client Service Reports are being completed by the technician undertaking the monthly routine maintenance checks, for internal records. Aquasol also utilises a Servicing and Maintenance Log Book on each project to have a record of services and maintenance conducted. Log books are filled out by authorised staff members.</p> <p>Aquasol samples the site monthly as an internal practice to confirm performance</p>	<ol style="list-style-type: none"> 1. Aquasol should prepare a Maintenance Plan spreadsheet in accordance with section 6.2 of the Asset Management Plan (WTP) and mark if off as tasks are completed. 2. Aquasol should ensure that the tasks undertaken during the weekly inspection of the WTP are documented, included in Aquasol's planned work program and marked off as it is completed. 3. Aquasol should ensure that, where not self-explanatory, the routine maintenance tasks are documented in more detail and work procedures developed where required e.g. water sampling procedure etc. 4. Aquasol should implement a procedure for checking the distribution and reticulation main systems on at least an annual basis, and the carrying out of maintenance to repair any observed fault. 	<p>Management to confirm that recommendations have been met.</p>	<p>Jared Rose, Site Manager</p> <p>Francisca Haro Environmental Co-ordinator</p>	<p>End of August 2015</p>

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	<p>of the WTP. The reviewer sighted Lancelin - monthly sampling results spreadsheet as well as a sample of Laboratory Reports. However, there is no water sampling procedure in place.</p> <p>During a site inspection, the Construction Manager advised that apart from the monthly general maintenance the Aquasol staff also inspect the WTP on a weekly basis. However, the tasks undertaken during the weekly inspection of the plant are not documented and the performance of the tasks is reliant on the knowledge of the key personnel, although the backup maintenance staff are trained in what to do.</p> <p>There is no routine maintenance plan in place for the current stage of sewage service operation and Aquasol's Environmental Co-ordinator confirmed that no routine maintenance of sewage system assets is currently taking place apart from the checking of the sewage pit level. Although, the reviewer confirmed that the sewage pit level is being checked, this is not documented in any maintenance checklist. No information was available on procedures for checking and maintaining the distribution mains, and reticulation system within the subdivision for leaks or other damage.</p>				
13/2015 B2	<p>Asset Management Information System – Testing of data backups</p> <p><i>Data backup procedures appear adequate and backups are tested.</i></p> <p>The system is backed up daily and a</p>	Aquasol should ensure that data backups are regularly tested, such as monthly, to ensure that data can be recovered.	Management to confirm at monthly basis that backups have been carried out.	Pili Lydiate Accounts and Administrator	Ongoing from end of June 2015

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	copy stored offsite as part of the standard IT maintenance procedure. However, there was no evidence that backups are regularly tested.				
14/2015 B2	<p>Risk Management - WWTP <i>Risk management policies and procedures exist and are being applied to minimise internal and external risks associated with the asset management system.</i></p> <p>The reviewer noted that the Risk Assessment for Sewage System was developed on the assumption that the WWTP has been already constructed and the risks associated with the current level of sewage service operation have not been considered and documented such as the failure by the waste water cartage contractor to pump out the sludge as required etc.</p>	Aquasol should consider the risks associated with the current level of sewage service, such as the failure by the waste water cartage contractor to pump out the sludge as required etc. and document the identified risks and treatment plans in the AMP for the Wastewater Treatment Services and in the WWTP Risk Register.	Management to confirm that recommendation has been addressed	Francisca Haro Environmental Co-ordinator	End of August 2015
15/2015 B2	<p>Risk Management – Keep risk register onsite <i>Risks are documented in a risk register and treatment plans are actioned and monitored.</i></p> <p>Treatment plans (mitigation and contingency) have been documented in the respective Asset Management Plans and detailed Risk Registers.</p> <p>As the treatment plans are mainly based on contingencies that are part of the design of the WTP plant, backup equipment and routine checks and maintenance performed as part of the weekly site inspections and monthly routine maintenance regime, the treatment plans are being actioned and</p>	Aquasol should ensure that current copies of the Risk Registers for Water Treatment Plant and Sewage System are kept on Aquasol's procedures file kept on site.	Management to confirm that recommendation has been met.	Jared Rose, Site Manager and Francisca Haro Environmental Co-ordinator	End of July 2015

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	<p>monitored as part of the daily operation and maintenance of the plant.</p> <p>However, current copies of the respective Risk Registers for Water Treatment Plant and Sewage System were not observed to be included on Aquasol's procedures file on site.</p>				
16/2015 B2	<p>Contingency Plan – Document and test emergency procedures</p> <p><i>Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks.</i></p> <p>Both Asset Management Plans for potable/non potable water and wastewater supply and respective Asset Registers include mitigation and management strategies. Although the treatment plans are mainly based on contingencies that are part of the design of the WTP plant, backup equipment and routine checks and maintenance performed as part of the weekly site inspections and monthly routine maintenance regime, the reliance is placed on the knowledge of key personnel to act in the emergency situations.</p> <p>All risk event “residual risk exposure” are identified as low as contingency measures have been put in place. Eg dual pumps operating in duty/standby to provide a backup where one pump fails. It is considered that the risk management strategies in place are adequate.</p> <p>The risk management planning is considered to covers all the significant risks for the WTP. The plant has</p>	<p>1. Based on the risk assessment in the AMPs, Aquasol should document the emergency procedures to cover events identified in the risk assessment as being higher risks as well as sewerage overflows from the gravity reticulation system. The contingency plans should include:</p> <ul style="list-style-type: none"> ○ Detailed procedures ○ Key contact details – name, number and location ○ Communication protocols ○ Specifications, location and availability of emergency equipment ○ Authorities that need to be contacted and when. <p>2. Once developed, the contingency plans should be reviewed and tested on at least an annual basis or whenever major changes are required to the plans to ensure they are operable and that appropriate persons are aware of their responsibilities in cases of emergency.</p>	<p>Management to confirm that recommendation has been met.</p>	<p>Francisca Haro Environmental Co-ordinator</p>	<p>End of September 2015</p>

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	<p>alarms and backup systems that allow water to be delivered while faults are resolved. However, the contingency measures and plans have not been formally documented and relevant staff formally briefed on their operation.</p> <p>No contingency plan has been considered for the existing waste water treatment, such as for sewerage overflow from the gravity reticulation system.</p>				
17/2015 A2	<p>Financial Planning – Update Financial Plan</p> <p><i>The financial plan provides for the operations and maintenance, administration and capital expenditure requirements of the services.</i></p> <p>The plan is based on the sale of a significant number of lots, projected to be 660 by 2017. The financial plan relates to Aquasol's performance, with revenue subsidised by Lancelin South Pty Ltd.</p> <p>It was observed that the actual rate of lot uptake is far lower than the projections. This may have negative impacts on the financial capacity of Lancelin South P/L to provide ongoing funds to Aquasol to run the Water Supply and Treatment systems in accordance with the Agreement.</p>	<p>The Financial Plan in the Asset Management Plans should be updated for the slower take-up of lots and the impact, if any, on the operating revenue and costs of providing the water treatment services.</p>	<p>Lancelin South Developer and Aquasol Management to confirm and agree on new sales projection, maintenance cost and associated documentation.</p>	<p>Sam Williams, Lancelin South Developer Manager</p> <p>Phil Pickering, Financial Consultant</p> <p>Paul Savage, Aquasol Director</p>	<p>End of October 2015</p>
18/2015 A2	<p>Review of Asset Management System</p> <p><i>A review process is in place to ensure that the asset management plan and the asset management system described therein are kept current.</i></p>	<p>As stated in the Asset Management Plans, the Plans should be reviewed on an annual basis.</p>	<p>Management to confirm that recommendation has been met.</p>	<p>Francisca Haro Environmental Co-ordinator</p>	<p>End of 2015 (annual)</p>

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	<p>Both Plans have a section on Monitoring and Review Procedures. This requires Asset Management Plans to be reviewed annually and reissued when changes occur to the current systems, processes and procedures, and external review of the system every 24 months as per the licence condition. The Plan has document control (version details).</p> <p>The Asset Management Plan - Lancelin South Development Waste Water Treatment Services was due for review in May 2014 but no evidence was provided of any review.</p>				