



Robe River Mining Co. Pty Ltd

**2021 Operational Audit and Asset Management System Review
Water Services Licence WL45**

Report

**Economic Regulation Authority
June 2021**

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Limitations of this Report

This report was prepared for distribution to the Economic Regulation Authority and Robe River Mining Co. Pty Ltd for the purpose of fulfilling Robe River Mining's operational audit and asset management system review obligations under its Water Services Licence. We disclaim any assumption of responsibility for any reliance on this report to any persons or users other than the Economic Regulation Authority and Robe River Mining or for any purpose other than that for which it was prepared.

Because of the inherent limitations of any internal control environment, it is possible that fraud, error or non-compliance may occur and not be detected. An audit is not designed to detect all instances of non-compliance with the procedures and controls over the licence obligations of the Water Services Licence, since we do not examine all evidence and every transaction. The audit and review conclusions expressed in this report have been formed on this basis.

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1. Independent Auditor's Report

Scope

Robe River Mining Co. Pty Ltd ('Robe River') has a Water Services Licence (WL45) (the 'Licence'), issued by the Economic Regulation Authority (the 'ERA') under the Water Services Act 2012 (the 'Act'), for the provision of potable water supply and sewerage services in the township of Pannawonica in the Pilbara.

We have performed a reasonable assurance engagement on Robe River's compliance, in all material respects, with the conditions of WL45 and the Water Services Act 2012 for the period 1 May 2017 to 30 April 2021.

Our evaluation was made against the licence obligations listed in the Water Compliance Reporting Manual 2021 and previous versions 2018 and 2017 and in accordance with the ERA's 2019 Audit and Review Guidelines: Water Licences.

The scope of this assurance work relates to assessing the Robe River's systems and effectiveness of processes and regulatory controls to ensure compliance with the obligations, standards, outputs and outcomes required by the Licence issued under the Act.

Modified Opinion

In our opinion, based on the procedures performed as outlined in the Audit Plan approved by the Economic Regulation Authority and the evidence we have obtained, Robe River has complied, in all material respects, with its licence conditions and relevant legislative obligations for the period 1 May 2017 to 30 April 2021.

We conducted our engagement in accordance with Australian Standard on Assurance Engagements ASAE 3100 Compliance Engagements (ASAE 3100). We believe that the assurance evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

In accordance with ASAE 3100 we have:

- Used our professional judgement to plan our procedures and assess the risks that may cause material non-compliance with each of the compliance requirements to be concluded upon;
- Considered internal controls implemented to meet the compliance requirements; however, we do not express a conclusion on their effectiveness; and
- Ensured that the engagement team possess the appropriate knowledge, skills and professional competencies.

Summary of Procedures

Our procedures consisted primarily of:

- Utilising ERA's 2019 Audit and Review Guidelines: Water Licences ('the Guidelines') to develop a risk assessment;
- Developing an Audit Plan and an associated work program, approved by the ERA on 4 May 2021;
- Interviewing relevant Robe River staff to gain an understanding of process controls;

Fieldwork

- Undertake a visit to the licensee in Perth and onsite in Pannawonica, and conduct various meetings with stakeholders, including corporate services and works/facilities management personnel, to determine the effectiveness of systems and procedures in place and to compare actual performance against the licence standards. The on-site visit included our Senior Engineer.
- Assessing documents and performing walkthroughs of processes and controls to support the assessment of compliance and the effectiveness of the control environment in accordance with Licence obligations; and
- Performing procedures and testing based on the procedures listed in the approved Audit Plan.

How We Define Reasonable Assurance and Material Non-Compliance

Reasonable assurance is a high level of assurance, but is not a guarantee that it will always detect a material non-compliance with the compliance requirements.

Instances of non-compliance are considered material if, individually or in the aggregate, they could reasonably be expected to influence relevant decisions of the intended users taken on the basis of the Licensee's compliance with the compliance requirements.

Inherent Limitations

Because of the inherent limitations of an assurance engagement, together with the internal control structure it is possible that fraud, error, or non-compliance with the compliance requirements may occur and not be detected.

A reasonable assurance engagement throughout the specified period does not provide assurance on whether compliance with the compliance requirements will continue in the future.

Use of this Assurance Report

This report has been prepared for Robe River and the ERA for the purpose of assessing compliance with the requirements of the License and may not be suitable for another purpose.

We understand that a copy of this report will be provided to the ERA for the purpose of reporting on the reasonable assurance engagement for the Licensee. We agree that a copy of this report may be provided to the ERA in connection with this purpose, but only on the basis that we accept no duty, liability or responsibility to the ERA in relation to the report.

We disclaim any assumption of responsibility for any reliance on this report, to any person other than the Licensee and the ERA, or for any other purpose other than that for which it was prepared.

Management's responsibility

Robe River's management are responsible for:

- The compliance activities undertaken to meet the requirements of the Licence;
- Identifying risks that threaten the compliance requirements identified above being met and identifying, designing and implementing controls to enable the compliance requirements to be met and, monitoring ongoing compliance;
- Ensuring that it has complied in all material respects with the requirements of the Licence;
- Establishing and maintaining an effective system of internal control over its systems designed to achieve its compliance with the Licence requirements;
- Implementing processes for assessing its compliance requirements and for reporting its level of compliance to the ERA; and
- Implementing corrective actions for instances of non-compliance (if any).

Our responsibility

Our responsibility is to perform a reasonable assurance engagement in relation to Robe River's compliance with its Licence requirements throughout the period and to issue an assurance report that includes our conclusion.

Our Independence and Quality Control

We have complied with our independence and other relevant ethical requirements of the *Code of Ethics for Professional Accountants* issued by the Australian Professional and Ethical Standards Board, and complied with the applicable requirements of Australian Standard on Quality Control 1 to maintain a comprehensive system of quality control.

We confirm that the ERA's 2019 Audit and Review Guidelines: Water Licenses have been complied with in the conduct of this audit/review and the preparation of the report, and that the audit findings reflect our professional opinion.

Quantum Management Consulting & Assurance



Geoff White CA
Director

29 July 2021

2. Executive Summary

2.1 Background

Robe River has a Water Services Licence, issued by the Economic Regulation Authority ('ERA') under the *Water Services Act 2012* ('Act'), for the provision of potable water supply and sewerage services in the township of Pannawonica in the Pilbara region of WA, near the Robe River, about 200 km south-east from Karratha. The township has approximately 400 residential and commercial properties which were built in 1970 to provide accommodation for mining staff, their families and the small number of non-mining support personal.

The operating area includes: the bore field; transmission pipeline (potable) to the town; distribution system (potable) within the town; sewerage and wastewater services assets within the town; and pipeline (sewerage and wastewater) from the town to the Waste Water Treatment Plant.

The assets are well-established with potable water and sewerage systems that have been in service for 40+ years and are critical to the wellbeing of the township and operation of the mine.

This audit and review covers the period 1 May 2017 to 30 April 2021. The previous audit and review was from 9 April 2015 to 30 April 2017.

The audit and review approach is based on the compliance obligations set out in the Licence, applicable legislation, regulatory guidelines (Water Compliance Reporting Manual 2020 and previous versions 2017 and 2018) and the 2019 Audit and Review Guidelines: Water Licences.

2.2 Operational Audit

This audit has been conducted to assess the licensee's level of compliance with the conditions of its licence.

Through the execution of the Audit Plan and assessment and testing of the control environment, the information system, control procedures and compliance attitude, the audit team members have gained reasonable assurance that Robe River has complied with its Water Services Licence obligations during the audit period from 1 May 2017 to 30 April 2021.

Out of 129 applicable compliance obligations, the audit found:

- 57 obligations were rated compliant, with adequate controls.
- 2 obligations were rated non-compliant with minor impact on customers, with adequate controls.
- 70 were not rated for compliance, as no relevant activity took place during the audit period (47 with adequate controls and 23 where controls were not reviewed).

The audit confirmed that Robe River has complied with its information reporting obligations for the period 1 May 2017 to 30 April 2021 except for a minor-non-compliance re a delay in reporting for 2017/18 which has been resolved.

The control environment is considered to be effective to manage compliance with the licence conditions.

2.3 Asset Management System Review

This review has been conducted to assess the effectiveness of the Licensee's asset management system.

Through the execution of the Review Plan and assessment and testing of the control environment, the information system, control procedures and compliance attitude, the audit team members have gained reasonable assurance that Robe River has operated the scheme in a reliable manner and provided a good level of service to the residents of Pannawonica.

The review found that Robe River has established an adequate control environment for ongoing compliance in respect of the asset management system.

For the review period from 1 May 2017 to 30 April 2021, both the potable water and sewer systems servicing the Pannawonica township, under Water Services Licence WL45 are considered to be operated with a professional and comprehensive approach. There were no recommended improvements.

Overall, the water supply scheme and wastewater treatment system are assessed as being well established, well maintained and in good working order.

Out of 58 effectiveness criteria for the asset management system, the review found:

- 56 criteria were rated as performing effectively with adequately defined controls; and
- 2 were rated as opportunity for improvement with adequately defined controls.

In terms of asset management processes, the environmental analysis and the asset management system are the processes with opportunities for improvement.

3. Operational Audit

3.1 Introduction

Robe River is required to comply with the terms and conditions of their license. There were two versions of the Water Services License WL45 in force over the audit period:

- Version 2 (From 1 July 2016 to 30 April 2020); and
- Version 3 (From 1 May 2020 onwards) with changes from the ERA's 2019 Water Licence Review.

Under the Act, water services' licensees are required to provide reports on an operational audit ('audit') and an effectiveness review of their asset management system ('review') once every 24 months, or another period that has been specified by the ERA.

The ERA engaged Quantum Management Consulting and Assurance ('Quantum') to undertake an audit and review of Robe River's water supply services, to comply with the licensing requirements of the ERA.

This audit and review covers the period 1 May 2017 to 30 April 2021. The previous audit and review was from 9 April 2015 to 30 April 2017.

The audit and review approach is based on the compliance obligations set out in the Licence, applicable legislation, regulatory guidelines (Water Compliance Reporting Manual 2020 and previous versions 2018 and 2017) and the 2019 Audit and Review Guidelines: Water Licences.

3.2 Objectives and Scope

The objective was to provide the ERA with an independent assessment of the licensee's compliance with relevant obligations under the licence.

The audit applied a risk-based audit approach. The scope of the audit included the adequacy and effectiveness of performance against the requirements of the licence by considering:

- **process compliance** - the effectiveness of systems and procedures in place throughout the audit period, including the adequacy of internal controls;
- **outcome compliance** – the actual performance against standards prescribed in the licence throughout the audit period;
- **output compliance** – the existence of the output from systems and procedures throughout the audit period (that is, proper records exist to provide assurance that procedures are being consistently followed and controls are being maintained);
- **integrity of reporting** – the completeness and accuracy of the compliance and performance reports provided to the ERA; and
- **compliance with any individual licence conditions** - the requirements imposed on the specific licensee by the ERA or specific issues that are advised by the ERA.

When assessing if a licensee has complied with its licence obligations, the auditor must apply a level of scrutiny that corresponds to a 'reasonable assurance engagement'. A reasonable assurance engagement is:

“An assurance engagement in which the assurance practitioner reduces engagement risk to an acceptably low level in the circumstances of the engagement as the basis for the assurance practitioner's conclusion. The assurance practitioner's conclusion is expressed in a form that conveys the assurance practitioner's opinion on the outcome of the measurement or evaluation of the underlying subject matter against criteria.” (ASAE3000)

The highest priority areas (priority 1, 2 or 3) based on inherent risk and the previous assessed controls/processes were:

- Cut off water supply to occupied dwelling (obligation 21); and
- Preserved water supply register and restrictions on reduced supply (obligations 154B, 154C and 154D).

The audit aimed to identify any areas where improvement is required and recommend corrective action as necessary.

3.3 Audit Compliance and Controls Rating Scale

The adequacy of controls and compliance with the legislative obligations was assessed using the following ratings.

Adequacy of Controls Rating		Compliance Rating	
Rating	Description	Rating	Description
A	Adequate controls – no improvement needed	1	Compliant
B	Generally adequate controls – improvement needed	2	Non-compliant – minor impact on customers or third parties
C	Inadequate controls – significant improvement required	3	Non-compliant – moderate impact on customers or third parties
D	No controls evident	4	Non-compliant – major impact on customers or third parties
NP	Not performed – controls not assessed in the audit.	NR	Not rated – no activity in current period

3.4 Status of Previous Audit Recommendations

The previous audit covered the period 9 April 2015 to 30 April 2017 and was reported in September 2017. There were no recommendations.

3.5 Summary of Audit Ratings of Controls and Compliance

The current audit assessment of the ratings for the adequacy of controls and compliance with the 192 applicable legislative obligations is shown below in the summary table and detailed obligations table.

Summary of Audit Ratings of Control and Compliance

Controls rating	Compliance Rating						Total
	Rating	1 Compliant	2 Non-compliant (minor impact)	3 Non-compliant (moderate impact)	4 Non-compliant (major impact)	NR Not rated	
A - Adequate		57	2	-	-	47	106
B – Generally adequate		-	-	-	-	-	-
C - Inadequate		-	-	-	-	-	-
D – No controls		-	-	-	-	-	-
NP – Not performed		-	-	-	-	23	23
Total		57	2	-	-	70	129

Detailed Audit Ratings of Control and Compliance by Obligation

No. ¹	Brief Description	Legislative Reference	Audit Priority applied (rated 1 = High to 5 = Low)	Obligation Not Applicable	Adequacy of Controls Rating ² (A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					Compliance Rating (1=Compliant, 2=Non-compliant (minor impact), 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated)				
					A	B	C	D	NP	1	2	3	4	NR
Water Services Act 2012														
2	Terms of service	Sec. 21(1)(b)	4						✓					✓
3	Provision of services	Sec. 21(1) (c)	4		✓					✓				
4	Operating area	Sec. 22	4						✓					✓
5	Outsourcing of services	Sec. 23	4		✓					✓				
6	Asset management system	Sec. 24(1)(a) & 24(2)	4		✓					✓				
7	Changes to asset management system	Sec. 24(1)(b)	4		✓									✓
8	Asset management system review	Sec. 24(1)(c)	4		✓					✓				
9	Operational audit	Sec. 25	4		✓					✓				
10	Code of practice	Sec. 26(3)	4	N/A										
13	Termination of service	Sec. 36	4						✓					✓
14	Supplier of last resort	Sec. 60	4	N/A										
15	Ombudsman scheme	Sec. 70(2)	4		✓					✓				
16	Interruption of water supplies	Sec. 77(3)	4		✓					✓				
17	Notification of building works	Sec. 82(4) & (5)	4		✓									✓
18	Ensuring water service works are done	Sec. 84(2)	4		✓									✓
19	Review of decisions	Sec. 87(2)	4		✓									✓
20	Construction near water service works	Sec. 90(7)	4		✓									✓
21	Cut off water supply	Sec. 95(3)	2		✓									✓
22	Fire hydrants for reticulation works	Sec. 96(1)	4						✓					✓
23	Requests from FESA or local government	Sec. 96(5)	4						✓					✓
24	Minister's direction re wastewater inlet	Sec. 98(3)	4						✓					✓
25	Compliance notice re failure to maintain fittings	Sec. 106(2)	4						✓					✓
28	Compliance notice issued by licensee re building works	Sec. 119(2)	4	N/A										
29	Review of decisions	Sec. 122(2)	4	N/A										
30	Apportionment of fees between properties	Sec. 125(2)	4						✓					✓
31	Lodging memorial to secure fees owing	Sec. 128(4)	4	N/A										

¹ The number refers to the Obligation reference in the Water Compliance Reporting Manual 2020 and previous versions 2017 and 2018 where applicable.

² Refer Controls and Compliance Rating Scales in Section 3.3.

No. ¹	Brief Description	Legislative Reference	Audit Priority applied (rated 1 = High to 5 = Low)	Obligation Not Applicable	Adequacy of Controls Rating ² (A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					Compliance Rating (1=Compliant, 2=Non-compliant (minor impact), 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated)				
					A	B	C	D	NP	1	2	3	4	NR
32	Notice to property owner - entry	Sec. 129(5)	4		✓					✓				
33	Notice to property owner – removal of fence	Sec. 139(3)	4	N/A										
34	Notice to roads authority	Sec. 141(1)	4		✓									✓
35 36 37 38 39	Proposal for major works	Sec. 142, 143(2) &(3), 144(3), 145(2)	4		✓									✓
40 41	Proposal for general works – Minister notices	Sec. 147(3) & (4)	4		✓									✓
42 43 44 45	Proposal for general works	Sec. 151(1) - (3), 153(3),	4		✓									✓
46 47 48	Interest in land	Sec. 166(5) - (6), 170	4	N/A										
49 50	Notice of entry to property and authority to enter	Sec. 173(4) & 174 (1)	4		✓					✓				
51	Notice of entry after entry without notice	Sec. 174 (3)	4		✓									✓
52 53 54 55 56 57	Notice of entry to property and authority to enter	Sec. 175(2) & (5), 176(1), (3) & (4) 181	4		✓									✓
58 59 60 61	Warrant to enter property	Sec. 186, 187(1) - (3), 190(4) - (5)	4		✓									✓
62	Compliance Officer	Sec. 210(5)	4		✓					✓				
63	Minimum disruption	Sec. 218(2)	4		✓					✓				
64	Physical damage	Sec. 218(3)	4		✓									✓
Water Services Regulations 2013														
65	Meter testing – multi-unit	Reg. 23(2)	4	N/A										
66	Meter testing - compliance	Reg. 24(4)	4	N/A										
67	Meter access - compliance	Reg. 26(3)	4	N/A										
68	Meter testing – tolerance	Reg. 26(5)	4	N/A										
69	Lot development	Reg. 29(1)	4	N/A										

No. ¹	Brief Description	Legislative Reference	Audit Priority applied (rated 1 = High to 5 = Low)	Obligation Not Applicable	Adequacy of Controls Rating ² (A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					Compliance Rating (1=Compliant, 2=Non-compliant (minor impact), 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated)					
					A	B	C	D	NP	1	2	3	4	NR	
70 71 72	Backflow prevention devices	Reg. 42(2), 43(3), 43(6).	4	N/A											
74	Work affecting roads	Reg. 60(2)	4		✓										✓
75	Breaks to road surface	Reg. 63	4		✓										✓
88A	Water efficiency management plan from customer	Reg. 80H	4						✓						✓
89	Compliance notice issued by licensee to include consequences and rights	Reg. 85	4		✓										✓
Water Services Code of Conduct (Customer Service Standards) 2018															
92	Information for customers	Cl. 8(1)-(3)	4		✓					✓					
93	Service connections period	Cl. 9(2) & (4)	4						✓						✓
94	Annual service charges	Cl. 10(2)	4	N/A											
95 96	Usage bills at least 4 monthly (6 Monthly in 2017)	Cl. 11(2) & (3)	4	N/A											
97	Estimated Bill of Usage - Regulation	Cl. 11(4)	4	N/A											
98 98A	Estimated Bill of Usage	Cl. 11(5) & (6)	4	N/A											
99	Address for billing	Cl. 12	4	N/A											
100	Billing information	Cl. 13(1)	4	N/A											
100A	Billing information – more than one service	Cl. 13(3)	4	N/A											
101	Billing information - usage	Cl. 13(4)	4	N/A											
101A	Billing information - estimate	Cl. 13(5)	4	N/A											
102A	Billing information – prescribed information	Cl. 13(6)	4	N/A											
103 104	Basic of billing estimate	Cl. 14(1) & (2)	4	N/A											
104A	Tariff information	Cl. 15(3)	4	N/A											
105	Request for meter reading	Cl. 16(1)	4	N/A											
106	Higher than normal charge	Cl. 17(2)&(3)	4	N/A											
107 108 109 110	Under and over charges	Cl. 18(2) - (5).	4	N/A											
111	Over charges – refunds (<i>Applicable until April 2018</i>)	Cl. 17(1)	4	N/A											
111A	Over charges - refunds	Cl. 19(2)	4	N/A											

No. ¹	Brief Description	Legislative Reference	Audit Priority applied (rated 1 = High to 5 = Low)	Obligation Not Applicable	Adequacy of Controls Rating ² (A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					Compliance Rating (1=Compliant, 2=Non-compliant (minor impact), 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated)								
					A	B	C	D	NP	1	2	3	4	NR				
112	Over charges – refunds (<i>Applicable until April 2018</i>)	Cl. 17(2)	4	N/A														
112A 112B 112C	Over charges - refunds	Cl. 19(3)-(5)	4	N/A														
113	Review of bill upon request	Cl. 20(1)	4	N/A														
114	Review of bill procedure – written procedure	Cl. 20(2)	4	N/A														
115	Review of bill procedure – information	Cl. 20(3) & (6)	4	N/A														
116	Review of bill procedure – ombudsman	Cl. 20(4)	4	N/A														
117	Review of bill procedure – timeframe	Cl. 20(5)	4	N/A														
117A	Notification of change in water service charge	Cl. 21	4	N/A														
118	At least 14 days for payment	Cl 23	4	N/A														
119	Payment methods - options	Cl. 24(1)	4	N/A														
120	Payment methods - fees	Cl. 24(2)	4	N/A														
121	Payment methods- direct debit authority	Cl. 25(1)	4	N/A														
122	Payment in advance	Cl. 26(1)	4	N/A														
123	Redirection of bills	Cl. 27	4	N/A														
124	Payment plan (<i>Applicable until April 2018</i>)	Cl. 25	4	N/A														
124A 124B 124C	Payment plan	Cl. 28(2), (3) & (4).	4	N/A														
125 126A 126B 127	Financial hardship policy	Cl. 29(1) - (5)	4		✓						✓							
126	Financial hardship policy (<i>Applicable until April 2018</i>)	Cl. 26(3)	4		✓						✓							
128	Financial hardship policy - publicly available	Cl. 29(6)	4		✓						✓							
129	Financial hardship policy – review (<i>Applicable until April 2018</i>)	Cl. 26(6)	4		✓						✓							
129A	Financial hardship policy – review	Cl. 29(7)	4		✓													✓

No. ¹	Brief Description	Legislative Reference	Audit Priority applied (rated 1 = High to 5 = Low)	Obligation Not Applicable	Adequacy of Controls Rating ² (A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					Compliance Rating (1=Compliant, 2=Non-compliant (minor impact), 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated)					
					A	B	C	D	NP	1	2	3	4	NR	
148	Complaints procedure – details (<i>Applicable until April 2018</i>)	Cl. 35(4)	4		✓						✓				
148A	Complaints procedure - Ombudsman	Cl. 46(4)	4		✓						✓				
149	Complaints procedure publicly available	Cl. 46(5)	4		✓						✓				
149A	Resolution of complaints	Cl. 47	4		✓										✓
150	No charge for information	Cl. 48(1)	4		✓										✓
151	No charge for information (<i>Applicable until April 2018</i>)	Cl. 36(1)	4		✓										✓
152	Access to customer information	Cl. 48(2)	4		✓										✓
153	Code of Conduct publicly available in hardcopy and on website	Cl. 49(1)	4		✓						✓				
154	Bill information on website	Cl. 49 (2)	4		✓						✓				
154A	Link to WA website	Cl. 49(3)	4		✓						✓				
154B	Preserved supply register	Cl. 51(1),(3)	2		✓						✓				
154C 1564D	Preserved supply register	Cl. 52 & 53	2		✓										✓
Licence Conditions – Specific Clauses															
155	Fees to regulator	Cl. 4.2.1	4		✓						✓				
159	Direction from ERA	Cl. 4.1.2	4						✓						✓
159A	Comply with terms and conditions of licence	Cl. 4.1.3	4		✓							✓			
160	Compliance with Accounting Standards	Cl. 4.6.1	4		✓						✓				
161	Compliance with performance standards	Cl. 5.2.1	4		✓						✓				
162	Operational audit	Cl. 5.3.4	4		✓						✓				
163	External administration	Cl. 4.7.1(a)-(c)	4						✓						✓
165	Provision of information to the ERA	Cl. 4.8.1	4		✓							✓			
166	Compliance reporting to ERA (<i>Applicable to April 2020</i>)	Cl. 3.8.2	4		✓						✓				
167	Performance reporting to ERA	Cl. 4.8.2	4		✓						✓				
168	Publishing information	Cl. 3.8.1 & 3.8.2	4						✓						✓
169	Notices in writing	Cl. 3.7.1	4		✓						✓				

No. ¹	Brief Description	Legislative Reference	Audit Priority applied (rated 1 = High to 5 = Low)	Obligation Not Applicable	Adequacy of Controls Rating ² (A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					Compliance Rating (1=Compliant, 2=Non-compliant (minor impact), 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated)				
					A	B	C	D	NP	1	2	3	4	NR
170A	Notify ERA of asset management system (AMS)	Cl. 5.1.1 (a) & (b)	4		✓					✓				
171	Notify ERA of material change to AMS	Cl. 5.1.3	4		✓									✓
172	AMS review	Cl. 5.1.7	4		✓					✓				
172A 172B	ERA direction re condition of service	Cl. 6.1.1-6.1.2	4					✓						✓
173	Ombudsman scheme (Applicable to April 2020)	Cl. 5.5.1	4		✓					✓				
175	Customer contract direction by ERA (Applicable to April 2020)	Cl. 5.1.1	4					✓						✓
176	Customer contract guidelines (Applicable to April 2020)	Cl. 5.1.2	4					✓						✓
177 178 179 180	Customer contract approval and amendment (Applicable to April 2020)	Cl. 5.1.3, 5.1.5, 5.3.1, 5.3.2, 5.3.4	4					✓						✓
181	Obligations of supplier of last resort	Cl. 6.3.1	4	N/A										
182	No services outside operating area	Cl. 4.4.1(b)	4					✓						✓
183	Financial hardship policy guidelines (Applicable to April 2020)	Cl. 5.4.3	4		✓					✓				
184	MOU with Department of Health ((potable water) (Applicable after May 2020)	Cl. 7.1.1	4		✓					✓				
184A	MOU with Department of Health (sewerage)	Cl. 7.1.2	4					✓						✓
184B	MOU with Department of Health (Applicable after May 2020)	Cl. 7.1.3	4		✓					✓				
185	MOU legal compliance	Cl. 7.1.4	4		✓					✓				
186	MOU compliance	Cl. 7.1.5	4		✓					✓				
187	MOU published	Cl. 7.1.6	4		✓					✓				
188	MOU - audit reports published	Cl. 7.1.7	4		✓									✓
189	MOU – other reports published	Cl. 7.1.8	4		✓					✓				
190	Service and performance standards (if applicable)	Schedule 2	4		✓					✓				

No. ¹	Brief Description	Legislative Reference	Audit Priority applied (rated 1 = High to 5 = Low)	Obligation Not Applicable	Adequacy of Controls Rating ² (A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed)					Compliance Rating (1=Compliant, 2=Non-compliant (minor impact), 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated)				
					A	B	C	D	NP	1	2	3	4	NR
Water Services Code of Practice (Family Violence) 2020														
191	Family violence policy (191 to 198 from March 2021)	Cl. 5(1)	4		✓					✓				
192	Family violence policy before the end of the six-month period	Cl. 5(2)	4		✓					✓				
193	Published family violence policy on website	Cl. 6	4		✓					✓				
194	Review of family violence policy once every 5-year period	Cl. 7	4		✓									✓
195	Records of compliance with this code	Cl. 8(1)	4		✓									✓
196	Retain records for at least 7 years	Cl. 8(2)	4		✓									✓
197	Inform customers of complaints procedure	Cl. 9	4		✓									✓
198	Website link to current copy of this Code	Cl. 10	4		✓					✓				

3.6 Detailed Audit Observations

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
Water Services Act 2012							
2	Section 21(1)(b)	Clause 4.3.1(b)	The licensee must if requested, offer to provide the water service authorised by the licence to any other person (not covered by section 21(1)(a) of the Act) within the operating area of the licence on reasonable terms, unless provision of the service is not financially viable or is otherwise not practicable.	4	The auditor confirmed with Robe River's Specialist Regulatory Compliance that no request for connection was made to the licensee from a person within the operating area who is not entitled to the service.	NP	NR
3	Section 21(1)(c)	Clauses 4.1.1	The licensee must provide, operate and maintain the water service works specified by the ERA in the licence for the purpose of section 11(3).	4	The operation and maintenance of the water service works was confirmed by this audit. This obligation is documented in the Asset Management Improvement Plan – Water and Wastewater Services ('Asset Management Plan').	A	1
4	Section 22	Clause 4.4.1(a)	The licensee must notify the ERA as soon as practicable before commencing to provide the water service outside of the operating area of the licence.	4	The auditor confirmed with Robe River's Specialist Regulatory Compliance and field observation that the licensee does not provide a water service outside of the operating areas set out in Plan Number: OWR-OA-308.	NP	NR
5	Section 23	Clause 4.5.1	All water service works used by the licensee in the provision of a water service must be held by the licensee, or must be covered by a works holding arrangement.	4	The auditor confirmed by discussion with the Rio Tinto Capital and Accounting team and review of the Asset Management Plan that the water service assets are owned or operated under contract by Robe River which is part of the Rio Tinto Group.	A	1

³ The number refers to the item reference in the Water Compliance Reporting Manual 2020, ERA or if applicable, 2017 and/or 2018 manuals.

⁴ The highest priority areas (priority 1, 2 or 3) based on inherent risk and expected controls/processes are highlighted in **RED**.

⁵ Controls Rating Scale: A=Adequate, B=Generally adequate, C=Inadequate, D=No controls, NP=Not performed.

⁶ Compliance Rating Scale: 1=Compliant, 2=Non-compliant (minor impact), 3=Non-compliant – moderate impact, 4=Non-compliant - major impact, NR=Not rated.

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
					This obligation is documented in the Asset Management Plan.		
6	Sections 24(1)(a) & 24(2)	Clause 5.1.1	The licensee must provide for an asset management system in respect of the licensee's water service works.	4	This audit confirmed the licensee has an asset management system (AMS). This obligation is documented in the Asset Management Plan.	A	1
7	Section 24(1)(b)	Clauses 5.1.2 and 5.1.3	The licensee must give details of the asset management system and any changes to it to the ERA (the licence prescribes timeframes for providing this information to the ERA – see obligations 170A and 171).	4	The auditor confirmed with Robe River's Specialist Regulatory Compliance and field observations that no changes have been made to the Asset Management System (AMS) during the audit period. The requirement to notify the ERA of any material change to the AMS within 10 days of the change is included in Asset Management Plan.	A	NR
8	Section 24(1)(c)	Clause 5.1.4	A licensee must provide the ERA with a report by an independent expert as to the effectiveness of its asset management system every 24 months, or such longer period as determined by the ERA.	4	Reviews of the asset management system have been completed as required by the ERA. The requirement to complete reviews is documented in the Asset Management Plan and the LAORS Approval / Agreement and Legislative Requirements Register.	A	1
9	Section 25	Clause 5.3.1	A licensee must, not less than once every 24 months, or such longer period as determined by the ERA, provide the ERA with an operational audit conducted by an independent expert appointed by the ERA.	4	Audits have been completed as required by the ERA. The requirement to complete audits is documented in the Asset Management Plan and the LAORS Approval / Agreement and Legislative Requirements Register.	A	1
10	Section 26(3)	Clause 4.1.1	The licensee must comply with each code of practice made by the Minister to the extent to which it applies to the licensee.	4	No Codes of Practice have been issued by the Minister. Therefore, not applicable	N/A	N/A
13	Section 36	Clause 4.1.1	If the licensee ceases to provide a water service in an area, the licensee must ensure that the water service works are left in a safe condition, and must not	4	The auditor confirmed with Robe River's Specialist Regulatory Compliance and field observation that the licensee did not cease to provide a water service in the area.	NP	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
			remove any part of the works except with the approval of the Minister.				
14	Section 60	Clause 6.3.1	If the licensee is the supplier of last resort for a designated area in relation to the provision of a particular water service, the licensee must perform the functions of the supplier of last resort and must comply with the relevant duties and carry out the relevant operations prescribed.	4	The auditor confirmed with Robe River's Specialist Regulatory Compliance that the licensee is not a supplier of last resort.	N/A	N/A
15	Section 70(2) (previously 66 until April 2020)	Clause 6.2.1	The licensee must not supply water services to customers unless the licensee: <ul style="list-style-type: none"> • is a member of the water services ombudsman scheme; and • is bound by the scheme; and • will comply with any decision or direction of the water services ombudsman under the scheme. 	4	The auditor confirmed with Robe River's Specialist Regulatory Compliance that during the audit period, Robe River Mining was a member of the water services ombudsman scheme and was bound by the scheme and complied with any directions. The membership was also confirmed by the Ombudsman website. This obligation is stated in the Complaint Policy (public).	A	1
16	Section 77(3)	Clause 4.1.1	The licensee must take reasonable steps to minimise the extent or duration of any interruption of water services it is responsible for.	4	The auditor confirmed by review of the Performance and Compliance Reports provided to the ERA for 2017/18, 2018/19 and 2019/20 that there were no unplanned interruptions of services. The auditor also confirmed with Robe River's onsite staff that there were only a few planned interruptions for maintenance and reasonable action was taken to minimise the extent and duration of any interruption. The obligation to minimise any unplanned or planned interruptions is stated in the Water Service Interruptions Guideline and supporting detailed procedures.	A	1

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
17	Sections 82(4) & (5)	Clause 4.1.1	If a person must give the licensee notice of any building work to be carried out on land in the operating area of a license, the licensee must return a copy of the plans and specifications contained in the notice with any written directions about the proposed building work that the licensee considers necessary to ensure the safety and efficacy of the provision of water services provided, or to be provided. The licensee must do this within 7 days of receiving the fee for dealing with the notification.	4	All building work is contracted by Robe River as the lessor of the property. The auditor sighted a procedure for “Keeping your distance – a guide for undertaking works near our water infrastructure” that is available to all residents of the town that covers any other types of building improvements. The procedure requires that approval be obtained from Robe River prior to any building works. No fee is charged. The auditor confirmed with Robe River’s Specialist Regulatory Compliance that no requests for building works were received in the audit period.	A	NR
18	Section 84(2)	Clause 4.1.1	If the licensee has given a notice under section 83(3)(a) of the Act, and the licensee is satisfied that the person given the notice is not going to comply with the notice within a reasonable time, the licensee must give the person 21 days’ notice of its intention to commence the works.	4	The auditor confirmed with Robe River’s Specialist Regulatory Compliance and review of the Compliance Officers (Water) Notices Register that no notices were given in the audit period for any additional water service works. This obligation is documented in the Compliance Officers (Water) – internal guideline.	A	NR
19	Section 87(2)	Clause 4.1.1	If a person makes an application with the State Administrative Tribunal for a review of a decision in respect of the licensee providing additional water services when a person has not responded to the licensee’s notice, the licensee cannot provide the works until the application has been finally dealt with, except in limited circumstances.	4	<i>As per item 18 above.</i>	A	NR
20	Section 90(7)	Clause 4.1.1	If the licensee gives a compliance notice to a person who is undertaking construction or carrying out similar works in the vicinity of water service works, the licensee must, to the extent practicable, consult with the owner of the land on	4	<i>As per item 18 above.</i>	A	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
			which the obstruction is located or the activity is taking place if the person to be given the notice is not the owner of the land.				
21	95(3)	Clause 4.1.1	The licensee cannot cut off the supply of water to an occupied dwelling unless the occupier agrees to that.	2	The auditor confirmed with Robe River's Specialist Regulatory Compliance that, during the audit period, the licensee did not cut off the supply of water to any occupied dwelling. The policy is to not cut off the water supply. The town's residents are not billed for any water services. This obligation is documented in the Water Service Interruptions Guideline.	A	NR
22	96(1)	Clause 4.1.1	If the licensee provides water supply reticulation works, or enters into an agreement for the provision of water supply reticulation works, the licensee must install fire hydrants attached to those works in accordance with the requirements of FESA, or the relevant local government as to the location and type of hydrant.	4	The auditor confirmed with Robe River's Specialist Regulatory Compliance that fire hydrants are installed in the town, and as sighted during the field observation. The Second Schedule of the Fire Brigades Act 1942, which lists the established fire districts (currently as at 26 July 2017) does not specify Pannawonica as being a fire district. As such, fire hydrants do not fall under Department of Fire and Emergency Services ('DFES') responsibility. Robe River's Specialist Regulatory Compliance advised that Robe River determined the location and type of fire hydrants and maintains them. The Rio Tinto Emergency Management Team act as the fire brigade. The hydrants comply with AS2419.1 (Fire Hydrant Installations). The auditor confirmed with Robe River's Specialist Regulatory Compliance that no requests have been made from the licensee's own team or the local government shire with regard to fire hydrants.	NP	NR
23	96(5)	Clause 4.1.1	The licensee must comply with requests made by FESA or a local government under sections 96(3) and 96(4) of the	4	Robe River's Specialist Regulatory Compliance advised that no formal requests have been received from DFES or the local government authority.	NP	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
			Act to the extent practicable and within a reasonable time.				
24	Section 98(3)	Clause 4.1.1	If required to by the Minister, the licensee must connect a wastewater inlet on land to the sewerage works of the licensee.	4	The auditor confirmed with Robe River's Specialist Regulatory Compliance that, during the audit period, no written notice requiring connection to the town's sewerage works has been received from the Minister.	NP	NR
25	Section 106(2)	Clause 4.1.1	The licensee must include the information specified in a compliance notice given in relation to failure to maintain fittings, fixtures and pipes.	4	The auditor confirmed with Robe River's Specialist Regulatory Compliance there is no trade waste discharged to the scheme i.e. wastewater other than wastewater of the kind and volume ordinarily discharged from an ordinary dwelling used solely or primarily as the dwelling of the occupants. Therefore, no compliance notices were issued during the audit period.	NP	NR
28	Section 119(2)	Clause 4.1.1	The licensee must include the information specified in a compliance notice given in relation to the matters set out in section 119(1).	4	The auditor confirmed with Robe River's Specialist Regulatory Compliance that all construction is managed by Robe River or contracted, so no compliance notices would be issued.	N/A	N/A
29	Section 122(2)	Clause 4.1.1	If a person makes an application to the State Administrative Tribunal under section 122(1), the licensee cannot take, or continue to take, action against the person except in the circumstances specified.	4	As per item 28.	N/A	N/A
30	Section 125(2)	Clause 4.1.1	If the licensee provides a water supply, sewerage or drainage service to 2 or more dwellings on land by a single property connection, the licensee may apportion fees. The licensee cannot apportion fees to the extent inconsistent with any agreement related to such a provision of services,	4	The auditor confirmed with Robe River's Specialist Regulatory Compliance that no fees are charged or apportioned between any lessees. If fees were to be apportioned, it would only be in accordance with the lease agreement.	NP	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
			or section 66 of the <i>Strata Titles Act 1985</i> .				
31	Section 128(4)	Clause 4.1.1	If the licensee has previously lodged a memorial with the Registrar, the licensee must lodge a withdrawal of memorial with Registrar along with the prescribed fee (if any) if the charge or contribution has been paid.	4	Robe River's Specialist Regulatory Compliance advised that no memorials would be lodged, as no fees are payable for the water services.	N/A	N/A
32	Section 129(5)	Clause 4.1.1	If a routine inspection or maintenance is likely to cause disruption to the occupants of a place at least 48 hours' notice of a proposed entry must be given to the occupier of the place unless the occupier agrees otherwise.	4	The auditor confirmed with Robe River's Specialist Regulatory Compliance that if entry was required, at least 48 hours' notice is given. For any planned interruptions to water services during the audit period, the required notice was given to residents. None required entry to the dwellings. Entry to all other places were given 48 hours' notice. This obligation is documented in the Compliance Officers (Water) - internal guidelines procedure, the Water Service Interruptions Guideline and the Iron Ore (WA) Pilbara Utilities: power of entry for maintenance purposes.	A	1
33	Section 139(3)	Clause 4.1.1	If the licensee removes or erects a fence or gate when exercising a works power conferred by the Act, the licensee must take all reasonable steps to notify the owner before doing so.	4	As Robe River is the owner of all properties in the town, this obligation is not applicable.	N/A	N/A
34	Section 141(1)	Clause 4.1.1	A person authorised by the licensee may enter a road and exercise a works power of the licensee without consent, notice or warrant unless the exercise of the power involves opening or breaking up the surface of the road, or would cause a major obstruction of the road or disruption of the traffic, in which case the licensee must give at least 48 hours'	4	The auditor confirmed with the Robe River staff that any road works would include giving at least 48 hours' notice to the local government authority and the residents. The auditor confirmed with that no works had been carried out in the audit period. This obligation is documented in the Core Services – SWP Water Services Act 2012 requirements – Working at premises and in roads procedure.	A	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
			notice to the public authority that has control or management of the road.				
35	Sections 142	Clause 4.1.1	The licensee must comply with sections 143 and 144 of the Act in relation to the proposed major works, and has given any notice required by section 148.	4	The auditor confirmed by interview with Robe River staff and review of the Asset Management System documentation that no major works have occurred during the audit period. The auditor confirmed that any major water works would include obtaining regulatory approvals and giving notice to the community and stakeholders, as part of the Core Services – SWP Water Services Act 2012 requirements – Major and general works procedure (sighted). These procedures cover the specific obligations in 36 to 41 below.	A	NR
36	Sections 143 (2)	Clause 4.1.1	Before the licensee submits a proposal for the provision of major works to the Minister, the licensee must prepare, publish and make available plans and details of those major works as specified.	4	As per item 35	A	NR
37	Sections 143 (3)	Clause 4.1.1	The licensee must, within 5 days of publishing the plans and details on the licensee's website, give notice setting out the matters prescribed in section 143(4) to the persons and agencies specified.	4	As per item 35.	A	NR
38	Section 144(3)	Clause 4.1.1	The licensee must have regard to an objection or submission lodged within the relevant period.	4	As per item 35.	A	NR
39	Section 145(2)	Clause 4.1.1	If the licensee makes alterations to the plans or details referred to in section 143(2), the licensee must give written notice of the alterations to any person who is likely to be adversely affected by those alterations.	4	As per item 35.	A	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
40	Section 147(3)	Clause 4.1.1	The licensee must comply with a direction given by a Minister in respect of a proposal to provide water service works that are major works under section 143(3).	4	As per item 35.	A	NR
41	Section 147(4)	Clause 4.1.1	If the Minister gives a direction that further notices in relation to the proposed major works be given under section 143(3), the licensee must resubmit the proposal.	4	As per item 35.	A	NR
42	Section 151(1)	Clause 4.1.1	A licensee proposing to provide water service works that are general works must prepare plans and details of the proposed works and publish and make them available for inspection.	4	The auditor confirmed by interview with Robe River staff and review of the Asset Management System documentation that no general works have occurred during the audit period. The obligation for any major water works include obtaining regulatory approvals and giving notice to the community and stakeholders, as documented in the Core Services – SWP Water Services Act 2012 requirements – Major and general works procedure.	A	NR
43	Section 151(2)	Clause 4.1.1	The licensee must give a notice of general works setting out the matters referred to in section 151(3) to the persons and agencies specified.	4	As per item 42.	A	NR
44	Section 152(3)	Clause 4.1.1	The licensee must have regard to an objection or submission lodged by the date specified in the notice given under section 151(2).	4	As per item 42.	A	NR
45	Section 153(3)	Clause 4.1.1	If the licensee makes alteration to those plans or details referred to in section 151, the licensee must give written notice of the alterations to any person who is likely to be adversely affected by those alterations.	4	As per item 42.	A	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
46	Section 166(5)	Clause 4.1.1	On being advised by the Minister that an interest in land is appropriate to the licensee's needs, the licensee is required to acquire the interest.	4	Part 7 – Powers in relation to interest in land under the Act does not apply to the licensee as all land is under the management of Robe River.	N/A	N/A
47	Section 166(6)	Clause 4.1.1	Any costs incurred in taking an interest in land are to be paid by the licensee.	4	As per item 46.	N/A	N/A
48	Section 170	Clause 4.1.1	The licensee must not sell an interest in land if the purchaser would hold a parcel of land that did not comply with the minimum lot size and zoning requirements under the <i>Planning and Development Act 2005</i> , unless the Minister permits the licensee to do so.	4	As per item 46.	N/A	N/A
49	Section 173(4)	Clause 4.1.1	In relation to entry to a place for the purposes of doing works, in the circumstances specified the licensee is required to give 48 hours' notice of proposed entry to a place to the occupier or owner, as applicable, unless the occupier or owner agrees otherwise.	4	<p>The auditor confirmed with Robe River's Specialist Regulatory Compliance that if entry was required, at least 48 hours' notice is required. As per the Water Supply Interruption Register, there were no unplanned interruptions during the audit period. Any planned interruptions were to repair sewer or water mains in the streets and none required access to any dwellings. The auditor confirmed with the onsite team that 48 hours' notice was given for any entry to outside of dwellings.</p> <p>The obligation to provide at least 48 hours' notice of entry is stated in the Water Services Interruptions Guidelines, Iron Ore (WA) Pilbara Utilities: power of entry for maintenance purposes, Compliance Officers (Water) - internal guidelines procedure, and the Core Services – SWP Water Services Act 2012 requirements – Working at Premises and Road and Water Services. These procedures cover the specific obligations 50 to 61 below.</p>	A	1

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
50	Section 174(1)	Clause 4.1.1	Notice of a proposed entry by the licensee must be in writing and must set out the purpose of the entry, including (if applicable) any work proposed to be carried out.	4	The auditor confirmed with the onsite team and review of the procedures that 48 hours' notice was given in writing and set out the purpose of entry, for any entry to outside of dwellings. The obligation is documented in the procedures stated in obligation 49.	A	1
51	Section 174(3)	Clause 4.1.1	Even if in a particular instance the licensee may enter a place under the Act without having to give notice of proposed entry, the licensee must when practicable, and when it will not compromise the reason for entry, give notice of entry to the occupier.	4	The auditor confirmed with the onsite team that there were no unplanned entries to premises. The obligation is documented in the procedures stated in obligation 49.	A	NR
52	Section 175(2)	Clause 4.1.1	If an occupier is present when the licensee proposes to enter a dwelling, the licensee must perform the prescribed actions before entering the premises.	4	The auditor confirmed with the onsite team that no entry was required to any dwelling. The obligation is documented in the procedures stated in obligation 49.	A	NR
53	Section 175(5)	Clause 4.1.1	If the licensee enters a dwelling that is unoccupied, the licensee must leave a notice, which includes the prescribed information, or a copy of the warrant (as applicable) in a prominent position in the dwelling before leaving the dwelling.	4	As per item 52.	A	NR
54	Section 176(1)	Clause 4.1.1	If the licensee has entered a place with or without consent, the licensee must leave the premises as soon as practicable after being notified that the owner or occupier has refused or withdrawn their consent.	4	The auditor confirmed with the onsite team that there were no instances of this obligation having occurred or being required.. The obligation is documented in the procedures stated in obligation 49.	A	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
55	Section 176(3)	Clause 4.1.1	The licensee must produce their certificate of authority if asked to do so, and must not perform, or continue to perform, a function under the Act if they are not able to do so.	4	As per item 54	A	NR
56	Section 176(4)	Clause 4.1.1	If the licensee enters or proposes to enter a place, and the owner or occupier requests the licensee produce evidence of authority for that entry, then the licensee must leave the place if they are unable to do so unless the owner or occupier agrees otherwise.	4	As per item 54.	A	NR
57	Section 181	Clause 4.1.1	The licensee, or a person assisting the licensee, must, as far as is practicable comply with any reasonable request from the owner or occupier intended to limit interference with the lawful activities of the owner or occupier.	4	As per item 54.	A	NR
58	Section 186	Clause 4.1.1	If the licensee applies for a warrant, the application must contain the prescribed information.	4	The auditor confirmed by review of the Compliance Officers (Water) Notices Register that no compliance notices or warrants had been applied for or issued during the audit period. This obligation is stated in the Compliance Officers (Water) - internal guidelines procedure.	A	NR
59	Sections 187(1) – (3)	Clause 4.1.1	If the licensee applies for a warrant to enter, the application must be made in accordance with the procedures specified depending on the location of the applicant and the justice.	4	As per item 58.	A	NR
60	Section 190(4)	Clause 4.1.1	Unless required to give a copy of the warrant, the licensee executing the warrant must produce the warrant for inspection by the occupier of the place	4	As per item 58.	A	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
			concerned on entry (if practicable), and if requested to do so.				
61	Section 190(5)	Clause 4.1.1	On completing the execution of a warrant the licensee must record the prescribed information on that warrant.	4	As per item 58.	A	NR
62	Section 210(5)	Clause 4.1.1	If the licensee designates a person as an inspector or compliance officer, the licensee must give that person a certificate of authority that includes certain prescribed information.	4	The auditor confirmed by interview with Robe River's Specialist Regulatory Compliance that two persons have been designated as Compliance Officers (Water). The Certificates of Designation were sighted and included the prescribed information. This requirement is documented in the Compliance Officers (Water) - internal guidelines procedure.	A	1
63	Section 218(2)	Clause 4.1.1	In the exercise or purported exercise of a power under the Act, the licensee must ensure that, to the extent practicable, the free use of any place is not obstructed, and that as little damage, harm or inconvenience is caused as is possible.	4	The auditor confirmed with the onsite team that this obligation was complied with in the entry to any premises during the audit period. The obligation is documented in the procedures stated in obligation 49.	A	1
64	Section 218(3)	Clause 4.1.1	If the licensee does any physical damage in the exercise of a works power or a power of entry, the licensee must ensure that the damage is made good, and pay compensation to the extent that it is not practicable to make good the damage.	4	The auditor confirmed with the onsite team that there was no physical damage that would require compensation. All property is owned by Robe River. The obligation is documented in the procedures stated in obligation 49.	A	NR
Water Services Regulations 2013							
65	Regulation 23(2)	Clause 4.1.1	If the licensee provides a water supply service in respect of a multi- unit development, the licensee must, on the request of the owner or the strata company, assess whether a meter is satisfactory for measuring the quantity	4	The audit confirmed with Robe Rivers' Specialist Regulatory Compliance that no meters are installed and there was no billing of water services in the audit period.	N/A	N/A

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
			or flow of water passing through a pipe supplying water to the unit.				
66	Regulation 24(4)	Clause 4.1.1	If the licensee gives a compliance notice to a person in respect of access to meters, the notice must specify the specified information.	4	As per item 65.	N/A	N/A
67	Regulations 26(3)	Clause 4.1.1	If the owner or occupier requests the licensee to test a meter and pays the charge (if any) for testing that type of meter, the licensee must test the meter in accordance with a procedure approved by the CEO for the purpose of this regulation.	4	As per item 65.	N/A	N/A
68	Regulation 26(5)	Clause 4.1.1	If a meter test finds that the meter is outside the prescribed tolerance applicable, the licensee must take the specified actions, bear the costs of testing and refund or credit any charges paid under regulation 26(3).	4	As per item 65.	N/A	N/A
69	Regulation 29(1)	Clause 4.1.1	The licensee must, on the written request of a developer who is required to pay the licensee an infrastructure contribution in respect of a subdivided lot, defer the payment of the contribution unless regulations 29(3) or 29(4) applies.	4	All lots are owned by Robe River. Not applicable.	N/A	N/A
70	Regulation 42(2)	Clause 4.1.1	The written order requiring the owner or occupier of land to install a backflow prevention device must set out the date which the device must be installed and tested (which must be at least 7 days after the order is given).	4	As per item 65.	N/A	N/A

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
71	Regulation 43(3)	Clause 4.1.1	The compliance notice given by the licensee to the owner or occupier of land must specify that the backflow prevention device be tested or maintained in accordance with the standard and the date by which the testing or maintenance is required to be done (which must be at least 7 days after the day the notice is given to the owner or occupier).	4	As per item 65.	N/A	N/A
72	Regulation 43(6)	Clause 4.1.1	The compliance notice requiring the owner or occupier of land to have their backflow prevention device made good as specified in the notice must include the work that is required to be done, the manner in which the work is to be done and the date by which the work is to be done (which must be at least 7 days after the notice is given)	4	As per item 65.	N/A	N/A
74	Regulation 60(2)	Clause 4.1.1	If the licensee proposes to exercise a works power in a road and considers that it is necessary to alter the position of infrastructure, the licensee must notify the person who is responsible for the infrastructure and may request that the person make the alterations within the time specified in the notice.	4	The auditor confirmed with the Robe River staff that any road works would include giving at least 48 hours' notice to the local government authority and the residents. The auditor confirmed with that no works had been carried out in the audit period. This obligation is documented in the Core Services – SWP Water Services Act 2012 requirements – Working at premises and in roads procedure.	A	NR
75	Regulation 63	Clause 4.1.1	If the licensee opens or breaks up the surface of a road, the licensee must complete the relevant work and reinstate and make good the road, and must take all reasonable measures to prevent that part of the road from being hazardous.	4	As per item 74.	A	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
88A	Regulation 80H	Clause 4.1.1	The licensee must, within 60 days after receiving a water efficiency management plan from an owner or occupier of a non-residential lot, approve the plan, request further information, or request a revised plan by written notice. <i>Note - This obligation is only relevant for Water Corp, Bunbury Water, Busselton Water, Hamersley Iron and Robe River Mining Company.</i>	4	The auditor confirmed with Robe River's Specialist Regulatory Compliance that no water efficiency management plans were received in the audit period.	NP	NR
89	Regulation 85	Clause 4.1.1	Compliance notices issued by the licensee must include a brief description of the possible consequences under the Act of not complying with the notice, and the rights of review under the Act in relation to the notice and who may apply for review.	4	The auditor confirmed with Robe River's Specialist Regulatory Compliance and review of the Compliance Officers (Water) Notices Register that no notices were given in the audit period for any water service works. This obligation is documented in the Compliance Officers (Water) – internal guideline.	A	NR
Water Services Code of Conduct (Customer Service Standards) 2018							
92	8(1)-(3)	Clause 4.1.1	The licensee must have written information for customers about the prescribed matters regarding connections and the information must be publicly available. <i>(Note: the information required by clause 8(2)(a) applies to the Water Corporation, Bunbury Water Corporation and Busselton Water Corporation only and the information required by clause 8(2)(g) applies only to licensees that supply potable water).</i>	4	The auditor sighted the information provided to customers and confirmed it covers the specified matters. The information is available online at the Rio Tinto website in the RT-Pilbara-Pannawonica Welcome Pack - and in hardcopy upon request.	A	1

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
			<p><i>Previous obligation until April 2020 - the licensee must have written information for customers about the prescribed matters regarding connections and the information must be available on the licensee's website and a hardcopy provided to a customer upon request at no charge.</i></p> <p><i>Note: The 2021 Water Compliance Manual included a requirement that for non-potable water supply, the licensee is to provide non-potable water on the basis that the customer is responsible for treatment of water fit for human drinking (obligations 92 to 139 and 144 to 154D). As the licensee does not provide non-potable water, this amendment does not apply to this audit.</i></p>				
93	9(2) and (4)		The licensee must ensure that, in any 12-month period, 90% of water supply service connections are completed before the end of 10 business days, starting on the day on which the customer has paid the relevant fees and complied with the relevant requirements.	4	There were no new connections during the audit period as confirmed by Robe River's Specialist Regulatory Compliance and the Water Licence Performance Reports for the audit period submitted to the ERA.	NP	NR
94	10(2)	Clause 4.1.1	If the licensee charges a fixed charge, the licensee must issue a bill for a fixed charge to each customer at least once in every 12-month period.	4	The audit confirmed with Robe Rivers' Specialist Regulatory Compliance that the licensee does not charge for its water services. Therefore, obligations 95 to 124C are not applicable.	N/A	N/A
95	11(2)	Clause 4.1.1	If the licensee charges a quantity charge, the licensee must issue a bill - for a quantity charge to each customer at least once in every 4-month period.	4	As per item 94.	N/A	N/A

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
96	11(3)	Clause 4.1.1	A bill for usage must be based on a meter reading to ascertain the quantity supplied or discharged.	4	As per item 94.	N/A	N/A
97	11(4)	Clause 4.1.1	If an accurate meter reading is not possible, a bill for usage must be based on an estimate, in accordance with the prescribed regulations (if any), of the quantity of water supplied or wastewater discharged. (Note: The Water Services Regulations 2013 did not address the estimation of bills at the time this Reporting Manual was published).	4	No applicable regulation is in place.	N/A	N/A
98	11(5)	Clause 4.1.1	If an accurate meter reading is not possible and there are no applicable regulations, a bill for usage must be based on a reasonable estimate of supply or discharge using one of the prescribed methods.	4	As per item 94.	N/A	N/A
98A	11(6) (Applicable after May 2018)	Clause 4.1.1	Despite subclauses 11(4) and (5), a bill for usage based on a meter reading must be issued at least once in every 12-month period.	4	As per item 94.	N/A	N/A
99	12	Clause 4.1.1	The licensee must send a bill to the address of the place where the water service is provided or, if the customer nominates another address, to the nominated address.	4	As per item 94.	N/A	N/A
100	13(1)	Clause 4.1.1	Each bill must contain the prescribed information.	4	As per item 94.	N/A	N/A
100A	13(3) (Applicable after May 2018)	Clause 4.1.1	A bill issued for 2 or more water services must specify the charge payable for each water service.	4	As per item 94.	N/A	N/A

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
101	13(4)	Clause 4.1.1	Each bill for usage for a metered water service must contain the specified information.	4	As per item 94.	N/A	N/A
101A	13(5)	Clause 4.1.1	If a bill for usage for a metered water service was based on an estimate, the bill must inform the customer that the licensee will tell the customer the prescribed information on request.	4	As per item 94.	N/A	N/A
102	<i>Water Services Code of Conduct (Customer Service Standards) 2013</i> Clause 12(3) <i>(Applicable until April 2018)</i>	Clause 3.1.1	Each bill must inform the customer of the specified information and where further details can be obtained. <i>Note: 2013 Code of Conduct.</i>	4	As per item 94.	N/A	N/A
102A	13(6) <i>(Applicable after May 2018)</i>	Clause 4.1.1	Each bill must contain the prescribed information.	4	As per item 94.	N/A	N/A
103	14(1)	Clause 4.1.1	If a bill is based on an estimate, the licensee must tell the customer on request the basis of the estimate and the reason for the estimate.	4	As per item 94.	N/A	N/A
104	14(2)	Clause 4.1.1	If a bill is based on an estimate, the licensee must make any adjustments to the next bill to take into account the extent to which the estimate was not	4	As per item 94.	N/A	N/A

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
			reasonable having regard to a subsequent and accurate meter reading.				
104A	15(3) (Applicable after May 2018)	Clause 4.1.1	Each bill for usage to which clause 15 applies must, in addition to the requirements of clause 13, contain the prescribed information.	4	As per item 94.	N/A	N/A
105	16(1)	Clause 4.1.1	The licensee must provide to the customer on request a meter reading and a bill (or revised bill if applicable) for outstanding charges outside of the usual bill cycle, or in case the customer disputes an estimate.	4	As per item 94.	N/A	N/A
106	17(2) and (3)	Clause 4.1.1	The licensee must have a written policy, standard or set of guidelines (available on the licensee's website and a hardcopy provided to a customer upon request at no charge) in relation to granting a discount to a customer whose meter reading indicates a water usage that is higher than normal for the customer but is likely to have been wasted because of a leak from the customer's system.	4	As per item 94.	N/A	N/A
107	18(2)	Clause 4.1.1	The licensee cannot recover an undercharged amount from a customer unless it is for water services provided in the 12-month period ending on the day on which the licensee informed the customer of the undercharging.	4	As per item 94.	N/A	N/A
108	18(3)	Clause 4.1.1	An undercharged amount must be the subject of, and explained in, a special bill or a separate item in the next bill.	4	As per item 94.	N/A	N/A

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
109	18(4)	Clause 4.1.1	The licensee must not charge interest or late payment fees on an undercharged amount.	4	As per item 94.	N/A	N/A
110	18(5)	Clause 4.1.1	The licensee must allow a customer to pay an undercharged amount by way of a repayment plan that has effect for the duration of the shorter of the prescribed periods starting on the day that the bill in clause 18(3) is issued.	4	As per item 94.	N/A	N/A
111	<i>Water Services Code of Conduct (Customer Service Standards) 2013</i> Clause 17(1) (Applicable until April 2018)	Clause 3.1.1	If the licensee overcharges a customer, the licensee must credit the customer's account and must immediately afterwards notify the customer, or inform the customer of the overcharging and recommend options for refunding or crediting the overcharged amount. <i>Note: 2013 Code of Conduct.</i>	4	As per item 94.	N/A	N/A
111A	19(2) (Applicable after May 2018)	Clause 4.1.1	The licensee must, within 15 business days of becoming aware of an overcharge, credit the overcharged amount to the customer's account or send the customer a notice informing the customer of the overcharging and recommending options for how the overcharged amount may be refunded or credited to the customer's account.	4	As per item 94.	N/A	N/A
112	<i>Water Services Code of</i>	Clause 3.1.1	The licensee must in accordance with the customer's instructions, refund or credit the customer's account within 15	4	As per item 94.	N/A	N/A

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
	<i>Conduct (Customer Service Standards) 2013 Clause 17(2) (Applicable until April 2018)</i>		business days from starting on the day the licensee received the instructions. <i>Note: 2013 Code of Conduct.</i>				
112A	19(3) <i>(Applicable after April 2018)</i>	Clause 4.1.1	If the licensee sends the customer an overcharging notice and receives instructions from the customer about the refunding or crediting of the overcharged amount, the licensee must refund the overcharged amount, or credit the overcharged amount to the customer's account within 15 business days of the licensee receiving the instructions.	4	As per item 94.	N/A	N/A
112B	19(4) <i>(Applicable after April 2018)</i>	Clause 4.1.1	If instructions from the customer about the refunding or crediting of the overcharged amount have not been received by the licensee at the end of the period of 10 business days starting on the day an overcharging notice is sent, the licensee must credit the overcharged amount to the customer's account before the end of the period of the next 15 business days.	4	As per item 94.	N/A	N/A
112C	19(5) <i>(Applicable after April 2018)</i>	Clause 4.1.1	The licensee must notify the customer immediately after crediting the overcharged amount to the customer's account under subclause (2)(a), (3) or (4).	4	As per item 94.	N/A	N/A

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
113	20(1)	Clause 4.1.1	The licensee must review a bill on the customer's request.	4	As per item 94.	N/A	N/A
114	20(2)	Clause 4.1.1	The license must have a written procedure for the review of a bill on the customer's request.	4	As per item 94.	N/A	N/A
115	20(3) and (6)	Clause 4.1.1	The review procedure in clause 20(2) must include the specified information and be available on the licensee's website and a hardcopy provided to a customer upon request at no charge.	4	As per item 94.	N/A	N/A
116	20(4)	Clause 4.1.1	The review procedure must state that the customer may, but does not have to, use the licensee's complaints procedure mentioned in clause 46 before or instead of applying to the water services ombudsman or, if available, making an appeal from, or applying for a review of, the decision under regulations mentioned in section 222(2)(k) of the Act.	4	As per item 94.	N/A	N/A
117	20(5)	Clause 4.1.1	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.	4	As per item 94.	N/A	N/A
117A	21 (Applicable after May 2018)	Clause 4.1.1	The licensee must notify each of its customers of any change to the amount or rate of a water service charge in accordance with the requirements in clause 21(2).	4	As per item 94.	N/A	N/A

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
118	23	Clause 4.1.1	The time set by the licensee for the payment of a bill must be after 14 days from when the bill is issued.	4	As per item 94.	N/A	N/A
119	24(1)	Clause 4.1.1	The licensee must allow a customer to pay a bill using any of the prescribed methods selected by the customer.	4	As per item 94.	N/A	N/A
120	24(2)	Clause 4.1.1	The licensee must, when offering bill payment method options, inform the customer of the fees and charges (if any) associated with each bill payment method offered.	4	As per item 94.	N/A	N/A
121	25(1)	Clause 4.1.1	Before receiving a bill payment by direct debit the licensee must obtain the express consent of the customer or of an adult person nominated by the customer to give consent.	4	As per item 94.	N/A	N/A
122	26(1)	Clause 4.1.1	The licensee must accept payment in advance from a customer on a customer's request.	4	As per item 94.	N/A	N/A
123	27	Clause 4.1.1	The licensee must on request and at no charge redirect a customer's bills because of the customer's absence or illness.	4	As per item 94.	N/A	N/A
124	<i>Water Services Code of Conduct (Customer Service Standards)</i>	Clause 3.1.1	The licensee must allow a customer to pay a bill under a payment plan or other arrangement under which the customer is given more time to pay the bill or to pay arrears if the customer is assessed		As per item 94.	N/A	N/A

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
	2013 Clause 25 (Applicable until April 2018)		by the licensee as experiencing payment difficulties. <i>Note: 2013 Code of Conduct.</i>				
124A	28(2) (Applicable after May 2018)	Clause 4.1.1	The licensee must advise a customer who has been assessed as experiencing payment difficulties that they have a right to pay the bill under a payment plan or other arrangement under which the customer is given more time to pay the bill or arrears, and the licensee must offer to enter into an appropriate plan or arrangement with the customer.	4	As per item 94.	N/A	N/A
124B	28(3) (Applicable after May 2018)	Clause 4.1.1	When formulating a payment plan or other arrangement for a customer that the licensee has assessed as experiencing payment difficulties, the licensee must take the customer's capacity to pay the bill into account. In the case of a bill for usage, the licensee must also take into account how much water has been supplied or wastewater has been discharged in previous billing periods.	4	As per item 94.	N/A	N/A
124C	28(4) (Applicable after May 2018)	Clause 4.1.1	The licensee must consider and decide whether or not the payment plan or other arrangement for a customer who has been assessed as experiencing payment difficulties should be interest-free, or fee-free, or both.	4	As per item 94.	N/A	N/A
125	29(1) and (2)	Clause 4.1.1 and Schedule	The licensee must have a written policy in relation to financial hardship that is approved by the ERA.	4	Robe River has a Financial Hardship and Payment Difficulty Policy covering all sites, including Pannawonica, although no billing applies to this site. The initial policy was approved by the ERA in	A	1

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
		3, clause 1.1.1			June 2015 and has been updated and approved by the ERA in 2018. As Robe River does not bill customers in Pannawonica, it is no longer required to have a financial hardship policy from May 2018.		
126	<i>Water Services Code of Conduct (Customer Service Standards) 2013</i> Clause 26(3) (Applicable until April 2018)	Clause 3.1.1	If the licensee's license was in place before the commencement of the Act, the licensee must have a financial hardship policy before the end of the 6 month period starting on the day of which section 27 of the Act comes into effect. <i>Note: 2013 Code of Conduct.</i>	4	Refer obligation 125.	A	1
126A	29(3) (Applicable after May 2018)	Clause 4.1.1	Unless the ERA approves otherwise, the licensee's financial hardship policy must comply with the ERA's guidelines (if any) in relation to financial hardship policies.	4	The Financial Hardship and Payment Difficulty Policy complied with the ERA guidelines.	A	1
126B	29(4) (Applicable after May 2018)	Clause 4.1.1	Unless the ERA approves otherwise, amendments to the licensee's financial hardship policy must be approved by the ERA and comply with the ERA's guidelines (if any) in relation to financial hardship policies.	4	Refer item 125.	A	1
127	29(5)	Clause 4.1.1	The licensee's financial hardship policy must be in effect within 6 months of the day of the grant of the license.	4	The initial Financial Hardship and Payment Difficulty Policy was approved by the ERA on 15 June 2015 which was within 6 months of the licence being granted on 9 April 2015.	A	1

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
128	29(6)	Clause 4.1.1	The licensee's financial hardship policy must be available on the licensee's website and a hardcopy provided to a customer upon request at no charge.	4	Robe River has a Financial Hardship and Payment Difficulty Policy covering all sites, including Pannawonica. The policy is available on the website and in hardcopy upon request.	A	1
129	<i>Water Services Code of Conduct (Customer Service Standards) 2013</i> Clause 26(6) <i>(Applicable until April 2018)</i>	Clause 3.1.1	The licensee must review its financial hardship policy at least once in every 5 year period and, as part of the review process, consult with relevant consumer organizations. <i>Note: 2013 Code of Conduct.</i>	4	Robe River has a Financial Hardship and Payment Difficulty Policy covering all sites, including Pannawonica, although no billing applies to this site. The initial policy was approved by the ERA on 15 June 2015 and was updated, and approved by the ERA on 22 March 2018. As there was no billing, the policy was no longer required from 1 July 2018 and this was confirmed by the ERA on 29 May 2018 and re-confirmed on 20 January 2020.	A	1
129A	29(7) <i>(Applicable after May 2018)</i>	Clause 4.1.1	The licensee must review its financial hardship policy at least once in every 5 year period.	4	As Robe River does not bill customers in Pannawonica, it is no longer required to have a financial hardship policy from 1 July 2018. Refer obligation 129.	A	NR
129B	29(8) <i>(Applicable after May 2018)</i>	Clause 4.1.1	The licensee must review its financial hardship policy if directed to do so by the ERA.	4	The auditor confirmed with Robe River's Specialist Regulatory Compliance that there were no directions from the ERA in the audit period to review the financial hardship policy. Refer obligation 129.	A	NR
129C	29(9) <i>(Applicable after May 2018)</i>	Clause 4.1.1	The licensee must consult with relevant consumer organisations when formulating or reviewing its financial hardship policy.	4	As Robe River does not bill customers in Pannawonica, it was no longer required to have a financial hardship policy from 1 July 2018. The previous update of the policy was approved by the ERA on 22 March 2018 which was prior to this obligation commencing. Therefore this is not	N/A	N/A

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
					applicable. Previous consultations were through the Pilbara Community Legal Service.		
130	<i>Water Services Code of Conduct (Customer Service Standards) 2013</i> Clause 27(2) (Applicable until April 2018)	Clause 3.1.1	The licensee must allow a customer experiencing financial hardship to pay a bill under an interest free or fee free payment plan other arrangement under which the customer is given more time to pay the bill or to pay arrears. <i>Note: 2013 Code of Conduct.</i>	4	The audit confirmed with Robe Rivers' Specialist Regulatory Compliance, there was no billing of water services in the audit period and therefore, no customers experiencing financial hardship or requiring a payment plan. Therefore, obligations 130 to 144 are not applicable,	N/A	N/A
130A	Clause 30(2) (Applicable after May 2018)	Clause 4.1.1	The licensee must advise a customer who has been assessed as experiencing financial hardship that they have a right to pay the bill under an interest-free and fee-free payment plan or other arrangement under which the customer is given more time to pay the bill or arrears, and the licensee must offer to enter into an appropriate plan or arrangement with the customer.	4	Refer obligation 130.	N/A	N/A
130B	30(3) (Applicable after May 2018)	Clause 4.1.1	When formulating a payment plan or other arrangement for a customer that the licensee has assessed as experiencing financial hardship, the licensee must take the customer's capacity to pay the bill into account. In the case of a bill for usage, the licensee must also take into account how much water has been supplied or wastewater	4	Refer obligation 130.	N/A	N/A

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
			has been discharged in previous billing periods.				
131	<i>Water Services Code of Conduct (Customer Service Standards) 2013</i> Clause 27(3) (Applicable until April 2018)	Clause 3.1.1	The licensee must also consider reducing the amount owed, review and revise, if appropriate, how a customer is paying a bill under clause 27(2) and provide the specified written information to a customer. <i>Note: 2013 Code of Conduct.</i>	4	Refer obligation 130.	N/A	N/A
131A	30(4)(a) (Applicable after May 2018)	Clause 4.1.1	The licensee must consider reducing the amount owing by the customer.	4	Refer obligation 130.	N/A	N/A
131B	30(4)(b) (Applicable after May 2018)	Clause 4.1.1	The licensee must review, upon request, how a customer is paying a bill under clause 30(2) and (3) and revise the payment plan or arrangement if the review indicates the customer is unable to meet the obligations.	4	Refer obligation 130.	N/A	N/A
131C	30(4)(c) (Applicable after May 2018)	Clause 4.1.1	The licensee must provide the specified written information to a customer.	4	Refer obligation 130.	N/A	N/A
132	<i>Water Services Code of Conduct</i>	Clause 3.1.1	Before the licensee enters into a payment plan or other similar arrangement with a customer who is not the owner of the land in respect of which the water service is provided, the	4	Refer obligation 130.	N/A	N/A

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
	(Customer Service Standards) 2013 Clause 28(1) (Applicable until April 2018)		licensee must ensure that the owner is aware of the proposed plan or arrangement. <i>Note: 2013 Code of Conduct.</i>				
133	31(4) and (5)	Clause 4.1.1	The licensee must have written information regarding the payment schemes and other assistance that is available to customers. The information must be available on the licensee's website and a hardcopy provided to a customer upon request at no charge.	4	Refer obligation 130.	N/A	N/A
133A	32 (Applicable after May 2018)	Clause 4.1.1	The licensee must not charge interest or fees for late payment of a bill by a customer in the specified circumstances.	4	Refer obligation 130.	N/A	N/A
134	33(1)(a)-(c)	Clause 4.1.1	The licensee must not commence or continue proceedings to recover a debt from a customer if the customer is complying with a payment plan or other arrangement, is being assessed for payment difficulties or is being assessed for financial hardship.	4	Refer obligation 130.	N/A	N/A
134A	33(1)(d)-(e) (Applicable after May 2018)	Clause 4.1.1	The licensee must not commence or continue proceedings to recover a debt from a customer if a complaint made by the customer to the licensee or water services ombudsman, which directly relates to the water service charge to which the debt relates, is not resolved by	4	Refer obligation 130.	N/A	N/A

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
			the licensee (or is not determined or is upheld by the ombudsman).				
135	40(1)	Clause 4.1.1	If the licensee has cut off or reduced the rate of flow of water to land under section 95(1)(b) of the Act, the licensee must restore the supply of water if the amount owing is paid, or if the customer enters into a payment arrangement for the amount owing that is satisfactory to the licensee.	4	Refer obligation 130.	N/A	N/A
136	40(2)	Clause 4.1.1	If the licensee has, under section 95(1)(a), (c), (d) or (e) of the Act, cut off or reduced the flow of water, the licensee must restore the supply of water if the licensee is satisfied that the reason for the disconnection or reduction no longer applies.	4	Refer obligation 130.	N/A	N/A
137	<i>Water Services Code of Conduct (Customer Service Standards) 2013</i> Clause 31 (Applicable until April 2018)	Clause 3.1.1	The licensee must not, under section 95(1)(b) of the Act, reduce the rate of flow of drinking water to a customer without having first used its best endeavors to inform the customer in person of its intention to do so if the amount owing is not paid. <i>Note: 2013 Code of Conduct.</i>	4	Refer obligation 130.	N/A	N/A
137A	36(1) (Applicable after May 2018)	Clause 4.1.1	The licensee must not start a water supply restriction unless the licensee has given the customer a reminder notice (that includes the information specified in clause 35), the water service charge has still not been paid in full, and	4	Refer obligation 130.	N/A	N/A

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
			the licensee has given the customer a restriction notice.				
137B	36(2) (Applicable after May 2018)	Clause 4.1.1	The licensee must not give a customer a restriction notice less than 7 days before the day on which the water supply restriction is proposed to start.	4	Refer obligation 130.	N/A	N/A
137C	36(3) (Applicable after May 2018)	Clause 4.1.1	The restriction notice must include the specified information.	4	Refer obligation 130.	N/A	N/A
138	37(1)(a)-(e) and (h)	Clause 4.1.1	The licensee must not start a water supply restriction if the specified circumstances apply.	4	Refer obligation 130.	N/A	N/A
138A	37(1)(f)-(g) (Applicable after May 2018)	Clause 4.1.1	The licensee must not start a water supply restriction if the specified circumstances apply.	4	Refer obligation 130.	N/A	N/A
138B	38	Clause 4.1.1	The licensee must not start a water supply restriction on or during the specified times.	4	Refer obligation 130.	N/A	N/A
139	39	Clause 4.1.1	The licensee must not, under section 95(1)(b) or (2) of the Act, reduce the rate of flow of water to a customer to below 2.3 litres each minute.	4	Refer obligation 130.	N/A	N/A
142	41(4)	Clause 4.1.1	The licensee (other than the Water Corporation) must restore a water supply to land within the specified timeframe, unless the licensee and customer expressly agree otherwise.	4	Refer obligation 130.	N/A	N/A
144	41(6)	Clause 4.1.1	The licensee (other than the Water Corporation) must ensure that there is a 90% compliance rate with clause 41(4)	4	Refer obligation 130.	N/A	N/A

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
			in any 12-month period ending on 30 June.				
144A	43(1) (Applicable after May 2018)	Clause 4.1.1	The licensee must give notice of any planned service interruption to each customer that will be affected by the service interruption.	4	The auditor confirmed with Robe River's Principal Advisor Hydrocarbons, Water and Wastewater that at least 48 hours' notice was given for any planned interruptions. Any planned interruptions were to repair sewer or water mains in the streets and none required access to any dwellings. This obligation is documented in the Water Service Interruptions Guideline.	A	1
144B	43(2) (Applicable after May 2018)	Clause 4.1.1	The notice of any planned service interruption must be given within the prescribed timeframes.	4	Refer obligation 144A.	A	1
144C	44(1) (Applicable after May 2018)	Clause 4.1.1	The licensee must have policies, practices and procedures for dealing with and minimising the impact of a burst, leak or blockage in its water supply works or sewerage works.	4	This obligation is documented in the Water Service Interruptions Guideline and the Pilbara Utilities – Pipe Break – Return of Potable Water Mains to Service (Drinking Water Quality) Standard Work Procedure ('SWP') and the Utilities Division – Sewer Overflow SWP.	A	1
144D	44(2) (Applicable after May 2018)	Clause 4.1.1	The policies, practices and procedures under clause 44(1) must deal with the prescribed matters.	4	The procedures noted in obligation 144C deal with the prescribed matters.	A	1
144E	45 (Applicable after May 2018)	Clause 4.1.1	The licensee must provide a 24 hour information line by means of which, at the cost of a local telephone call (excluding mobile telephones), a customer can notify the licensee of emergencies and faults, and get information about the reason for, and the expected duration of, any unplanned service interruption.	4	The auditor confirmed that a 24 hour information line is available with the contact details on the Rio Tinto website in the RT-Pilbara-Pannawonica Welcome Pack.	A	1

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
145	46(1)	Clause 4.1.1	The licensee must have a written complaints procedure in relation to investigating and dealing with complaints of customers about the provision of water services by the licensee or a failure by the licensee to provide a water service.	4	The auditor sighted the Utilities Division – Complaint Dispute Resolution Policy and form (available publicly) and the Core Services Customer Complaints Resolution Guideline. The policy and guideline included the required information.	A	1
146	46(2)	Clause 4.1.1	The licensee's complaints procedure must be developed using as minimum standards the relevant provisions of AS/NZS 10002-2014 and the ERA's guidelines (if any).	4	The Policy and Guideline are compliant with the relevant provisions of AS ISO 10002-2014 and the ERA's Customer Complaints Guidelines dated December 2016.	A	1
147	46(3)	Clause 4.1.1	The licensee's complaints procedure must provide for the matters specified in relation to lodgment of complaints, responding to complaints, dispute resolution arrangements and resolving complaints.	4	The audit reviewed the Utilities Division – Complaint Dispute Resolution Policy and form (available publicly) and the Core Services Customer Complaints Resolution Guideline. and noted that the policy and guideline cover how complaints are to be lodged and recorded, dispute resolution arrangements, time limits and methods for responding, and the alternative of referring a complaint to the Energy and Water Ombudsman.	A	1
148	<i>Water Services Code of Conduct (Customer Service Standards) 2013</i> Clause 35(4) <i>(Applicable until April 2018)</i>	Clause 3.1.1	The licensee's complaints procedure must inform the customer that they do not have to use the licensee's complaints procedure, provide details of procedures under the Act, and set out the costs and benefits to the customer if they use the complaint resolution procedure or instead of the procedures under the Act. <i>Note: 2013 Code of Conduct.</i>	4	The auditor confirmed with the Specialist Regulatory Compliance that no complaints have been recorded for Pannawonica in the audit period, and as per the Complaints Register. The Robe River's Utilities Division – Complaint and Dispute Resolution Policy informs the customer that they do not have to use the licensee's complaints procedure, provides details of procedures under the Act, and sets out the costs and benefits to the customer if they use the complaint resolution procedure instead of the procedures under the Act.	A	1

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
148A	46(4) (Applicable after May 2018)	Clause 4.1.1	The licensee's complaints procedure must list the procedures available to the customer under the Act as to 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, if an appeal or review is available under regulations mentioned in section 222(2)(k).	4	Refer obligation 148. The procedure covers this obligation.	A	1
149	46(5)	Clause 4.1.1	The licensee's complaints procedure must be available on the licensee's website and a hardcopy provided to a customer upon request at no charge.	4	The auditor confirmed the Utilities Division – Complaint Dispute Resolution Policy and form are available on Rio Tinto's website and in hardcopy upon request.	A	1
149A	47 (Applicable after May 2018)	Clause 4.1.1	When the licensee considers that a customer's complaint has been resolved the licensee must advise the customer accordingly, inform the customer that the customer has a right to apply to the water services ombudsman for a review of the complaint, and provide a Freecall telephone number for the water services ombudsman.	4	The auditor confirmed with the Specialist Regulatory Compliance that no complaints have been recorded for Pannawonica in the audit period, and as per the Complaints Register. The Robe River's Utilities Division – Complaint and Dispute Resolution Policy informs the customer that they may apply to the water service ombudsman and states the contact details.	A	NR
150	48(1)	Clause 4.1.1	The licensee must provide a customer with the specified services on request and at no charge.	4	Under this Section of Code, the licensee must provide a customer with the following on request and at no charge: <ul style="list-style-type: none"> a) services for account, payment and general enquiries for use by customers with hearing or speech impaired; b) interpreter services for account, payment and general enquiries; c) a large-print version of any of the licensee's publicly available documents. The auditor confirmed with Robe Rivers' Specialist Regulatory Compliance that the information is	A	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
					available in the above formats and that during the audit period, no such request has been received. The information is available online at the Rio Tinto website in the RT-Pilbara-Pannawonica Welcome Pack and in hardcopy upon request at no charge.		
151	<i>Water Services Code of Conduct (Customer Service Standards) 2013</i> Clause 36(1) <i>(Applicable until April 2018)</i>	Clause 3.1.1	The licensee must provide a customer with the specified services on request and at no charge. <i>Note: 2013 Code of Conduct.</i>	4	The auditor confirmed with Robe Rivers' Specialist Regulatory Compliance that the information is available and that during the audit period, no such request has been received. This obligation is documented in the RT-Pilbara-Pannawonica Welcome Pack on the website and available in hardcopy upon request and at no charge.	A	NR
152	48(2)	Clause 4.1.1	The licensee must make available to each customer, at no charge, the customer's personal account information including information about bills previously issued to the customer and about the quantity of water supplied to, or wastewater discharged by, the customer in previous billing periods.	4	The auditor confirmed with Robe Rivers' Specialist Regulatory Compliance that the information is available and that during the audit period, no such request has been received. This obligation is documented in the RT-Pilbara-Pannawonica Welcome Pack on the website and available in hardcopy upon request and at no charge.	A	NR
153	49(1)	Clause 4.1.1	The licensee must make the prescribed information publicly available. <i>Previous obligation until April 2020 – the licensee must make the prescribed information publicly available on the licensee's website and a hardcopy provided to a customer upon request at no charge.</i>	4	As Robe River does not charge for the provision of a water service, clauses 49(1),(a), (b), (c), (g) and (h) do not apply. Other clauses to clause 49(1)(l) are applicable. The licensee must make the "prescribed information" publicly available. The definition of "publicly available" per Clause 3 of the Water	A	1

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
					Services Code of Conduct is available on the website and in hardcopy upon request at no charge. The auditor confirmed that the “prescribed information” set out in Clause 49 of the Code is available to customers in the Policies published on Rio Tinto’s website and available in hardcopy upon request at no charge.		
154	49(2)	Clause 4.1.1	The licensee must ensure that the specified information about bills may be obtained from its website.	4	As Robe River does not charge for any water services, clauses 49(2)(a) to (e) do not apply. The information about the customer complaints procedure per Clause 49(2)(f) is available on the Rio Tinto website.	A	1
154A	49(3) (Applicable after May 2018)	Clause 4.1.1	The licensee must ensure that its website contains a link to the current version of this code appearing on the website that is maintained by or on behalf of the Western Australian Government and that provides public access to electronic versions of Western Australian legislation.	4	The auditor sighted the current version of the Code on the website under the Publications and Reports section and the link to the WA legislation site.	A	1
154B	51(1) and (3) (Applicable after May 2018)	Clause 4.1.1	The licensee must maintain an up-to-date preserved supply register for the purposes of Part 9 of the Code if the licensee meets the criteria in clause 51(2). The register must record the prescribed information in clause 51(3) if the criteria in clause 51(2) applies to the licensee. <i>Note: Changes in Italics were made to the obligation in May 2020.</i>	2	The auditor sighted the Life Support Register and confirmed that it included the prescribed information. There were no customers recorded for Pannawonica. This obligation is stated in the Utilities Division – Life Support Register procedure.	A	1
154C	52	Clause 4.1.1	The licensee must not, under section 95(1)(b) of the Act, reduce the rate of flow of a supply of water to a supply	2	The auditor confirmed with Robe River’s Specialist Regulatory Compliance that, during the audit period, the licensee did not reduce the rate of water flow to	A	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
	<i>(Applicable after May 2018)</i>		address recorded on the preserved supply register. * *Potable water only.		any property. The town's residents are not billed for any water services. This obligation is stated in the Utilities Division – Life Support Register procedure, Utilities Division - Invoicing and metering procedure and the Water Service Interruptions Guideline.		
154D	53 <i>(Applicable after May 2018)</i>	Clause 4.1.1	Despite clause 43(3), in the case of a service interruption that will affect a supply address recorded on the preserved supply register, the notice required by clause 43(1) must be sent by post or delivered to that supply address.	2	The auditor sighted the preserved supply register. There were no customers recorded for Pannawonica. This obligation is stated in the Utilities Division – Life Support Register procedure.	A	NR
Other License conditions							
155	<i>Water Services Act</i> Section 12	Clause 4.2.1	The licensee must pay the applicable fees and charges in accordance with the Economic Regulation Authority (Licensing Funding) Regulation 2014.	4	The auditor confirmed the annual fees to the ERA have been paid during the audit period. This obligation is stated in the Rio Tinto (WA) Pilbara Utilities Water Services Guidance Note and the Rio Tinto (WA) Utilities Compliance Schedule.	A	1
159	<i>Water Services Act</i> Section 12	Clause 4.1.2	The licensee must comply with a direction from the ERA in relation to a breach of applicable legislation.	4	The auditor confirmed with Robe River's Specialist Regulatory Compliance and by review of ERA's website that the ERA did not issue a direction in relation to a breach of applicable legislation during the audit period.	NP	NR
159A	<i>Water Services Act</i> Section 12 <i>(Applicable until April 2020)</i>	Clause 4.1.3	The licensee must comply with the terms and conditions of the licence.	4	This audit has confirmed Robe River's compliance with the licence with the minor non-compliance relate reporting to ERA stated in obligation 165. As this has been resolved with the 2018/19 and 2019/20 reports being submitted by the due dates, no recommendation is made.	A	2

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
160	<i>Water Services Act</i> Section 12	Clause 4.6.1	The licensee and any related body corporate must maintain accounting records that comply with standards issued by the Australian Accounting Standards Board or equivalent International Accounting Standards.	4	The auditor reviewed Robe River's Financial Reports for the years ended 31 December 2017, 2018 and 2019 and confirmed compliance. The 2020 report was not available at the date of audit as ASIC has granted an extension.	A	1
161	<i>Water Services Act</i> Section 12	Clause 5.2.1	The licensee must comply with any individual performance standards prescribed by the ERA.	4	From review of the Performance Reports to the ERA for 2016/17, 2018/19 and 2019/20 and a register kept of water flow/pressure testing annually, the auditor confirmed the water flow rate and pressure meet the performance standards in Schedule 2 of the licence. The required performance standards are documented in the "Standard connections for water, sewerage and electricity supply policy".	A	1
162	<i>Water Services Act</i> Section 12	Clause 5.3.4	The licensee must cooperate with the independent expert and comply with the ERA's audit and review guidelines dealing with the operational audit.	4	This audit/review is designed in accordance with the Audit Guidelines. The licensee has fully cooperated with this audit.	A	1
163	<i>Water Services Act</i> Section 12	Clause 4.7.1(a), (b), (c)	The licensee must report to the ERA, in the manner prescribed, if a licensee is under external administration or there is a change in the circumstances upon which the licence was granted which may affect a licensee's ability to meet its obligations.	4	The auditor confirmed by interview and review of Robe River's Financial Reports for the audit period that it was not under external administration during the audit period.	NP	NR
165	<i>Water Services Act</i> Section 12	Clause 4.8.1	The licensee must provide the ERA specified information relevant to the operation of the licence or the licensing scheme, or the performance of the ERA's function under the Act in the manner and form specified by the ERA.	4	In accordance with the Water Compliance Reporting Manual 2021 and previous versions, Robe River is required to submit to the ERA: <ul style="list-style-type: none"> • Annual performance reports no later than 31 August for the reporting year ending 30 June; and • Annual compliance reports by 31 August for the year ending 30 June. 	A	2

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
					<ul style="list-style-type: none"> Annual standing charge customer data by 31 August for the year ending 30 June. <p>The auditor reviewed Robe River's correspondence with the ERA and the Compliance and Performance Reports for 2016/17, 2017/18, 2018/19 and 2019/20 and confirmed the reports had been submitted by the due dates with a minor non-compliance, as follows:</p> <ul style="list-style-type: none"> The 2017/18 Performance Report and standing charge data were submitted 13 days after the due date. <p>As this has been resolved with the 2018/19 and 2019/20 reports being submitted by the due dates, no recommendation is made.</p> <p>This obligation is documented in the Utilities Compliance Schedule, Statutory Reporting and Guidance Register and the Pilbara Utilities – Annual water services reporting.</p>		
166	<i>Water Services Act</i> Section 12 (Applicable until April 2020)	Clause 3.8.2	The licensee must comply with any information reporting requirements prescribed by the ERA, including but not limited to the provisions of the <i>Water Compliance Reporting Manual</i> that apply to the licensee.	4	<p>The annual Compliance Reports submitted to the ERA confirmed that no non-compliances were reported except the 2018/19 Compliance Report included a non-compliance re the late submission of the Performance Report and standing charge data for 2017/18.</p> <p>The auditor also confirmed with the Robe River's Specialist Regulatory Compliance there were no other information reporting requirements prescribed by the ERA in the audit period.</p> <p>This obligation is documented in the Statutory Reporting and Guidance Register.</p>	A	1
167	<i>Water Services Act</i>	Clause 4.8.2	The licensee must provide the ERA with the data required for performance reporting purposes that is specified in	4	The auditor reviewed Robe River's correspondence with the ERA and the Compliance and Performance Reports for 2016/17, 2017/18, 2018/19 and	A	1

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
	Section 12		the Water, Sewerage and Irrigation Licence Performance Reporting Handbook, and the National Performance Framework that apply to the licensee.		2019/20 and confirmed the reports had been submitted with the required data. This obligation is documented in the Utilities Compliance Schedule, Statutory Reporting and Guidance Register and the Pilbara Utilities – Annual water services reporting.		
168	<i>Water Services Act</i> Section 12	Clause 3.8.1 and 3.8.2	Subject to clause 3.8.3, the licensee must publish within the specified timeframe any information that the ERA has directed the licensee to publish under clause 3.8.1.	4	The auditor confirmed with Robe River's Specialist Regulatory Compliance that there were no directions from the ERA to publish information.	NP	NR
169	<i>Water Services Act</i> Section 12	Clause 3.7.1	Unless otherwise specified, all notices must be in writing.	4	The auditor reviewed Robe River's correspondence with the ERA in the audit period and confirmed compliance. All correspondence observed was in hardcopy letter or email.	A	1
170A	<i>Water Services Act</i> Section 12 (Applicable from May 2020)	Clause 5.1.1(a) and (b)	The licensee must notify the ERA of the details of the asset management system within five business days from the later of: a) the commencement date; or b) the completion of construction of the licensee's water service works.	4	The ERA has been notified of and has approved the asset management system as part of the licence approval.	A	1
171	<i>Water Services Act</i> Section 12	Clause 5.1.3	The licensee must notify the ERA of any material change to the asset management system within 10 business days of the change.	4	The auditor confirmed with Robe River's Specialist Regulatory Compliance and field observations that no material changes have been made to the Asset Management System (AMS) during the audit period. The requirement to notify the ERA of any material change to the AMS within 10 days of the change is included in Asset Management Plan.	A	NR
172	<i>Water Services Act</i>	Clause 5.1.7	The licensee must cooperate with the independent expert and comply with the ERA's audit and review guidelines	4	This review is being undertaken in accordance with the Audit and Review Guidelines. The license has fully co-operated with this audit.	A	1

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
	Section 12		dealing with the asset management system review.		This obligation is stated in the Rio Tinto (WA) Pilbara Utilities Water Services Guidance Note and the Rio Tinto (WA) Utilities Compliance Schedule.		
172A	<i>Water Services Act</i> Section 12 (Applicable from May 2020)	Clause 6.1.1	If the ERA considers that one or more of a licensee's standard terms and conditions of service is no longer in the public interest, the ERA may direct the licensee: a) to amend: i) the standard term or condition of service; or ii) the standard term or condition of service in accordance with a term proposed by the ERA; and b) to do so within a specified period.	4	Robe River's Specialist Regulatory Compliance confirmed there has been no directive from the ERA.	NP	NR
172B	<i>Water Services Act</i> Section 12 (Applicable from May 2020)	Clause 6.1.2	The licensee must comply with a direction given to the licensee under clause 6.1.1.	4	Robe River's Specialist Regulatory Compliance confirmed there has been no directive from the ERA.	NP	NR
173	<i>Water Services Act</i> Section 12 (Applicable until April 2020)	Clause 5.5.1	The licensee must not supply water service to customers unless the licensee is a member of and bound by the water services ombudsman scheme.	4	The auditor confirmed by interview with Robe River's Specialist Regulatory Compliance and review of the correspondence between the licensee and the Energy and Water Ombudsman (WA), that the licensee is a member of the Water Services Ombudsman Scheme. This obligation is stated in the Rio Tinto (WA) Pilbara Utilities Water Services Guidance Note and the Complaint and dispute resolution policy.	A	1
175	<i>Water Services Act</i> Section 12	Clause 5.1.1	If directed by the ERA, the licensee must submit a draft customer contract for approval.	4	Robe River's Specialist Regulatory Compliance confirmed there has been no directive from the ERA.	NP	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
	(Applicable until April 2020)						
176	Water Services Act Section 12 (Applicable until April 2020)	Clause 5.1.2	The licensee must comply with any Customer Contract Guidelines that apply to the licensee.	4	Robe River's Specialist Regulatory Compliance confirmed there were not any Customer Contract Guidelines that applied to the licensee during the audit period.	NP	NR
177	Water Services Act Section 12 (Applicable until April 2020)	Clause 5.1.3	The licensee may only amend the customer contract with the ERA's approval.	4	Refer obligation 176.	NP	NR
178	Water Services Act Section 12 (Applicable until April 2020)	Clause 5.1.5	The licensee must comply with any direction by the ERA to amend the customer contract.	4	Refer obligation 176.	NP	NR
179	Water Services Act Section 12 (Applicable until April 2020)	Clause 5.3.1 and 5.3.1	Unless clause 5.3.3 applies, the licensee cannot enter into an agreement with a customer to provide water services that exclude, modify or restrict the terms and conditions of the license or the requirements of the <i>Code of Conduct</i> without the prior approval of the ERA.	4	The auditor confirmed with Robe River's Specialist Regulatory Compliance that the licensee did not enter into an agreement with any customers to exclude, modify or restrict the terms and conditions of the licence or the requirements of the Code of Conduct. The contract provisions are documented in the Standard connections for water, sewerage and electricity supply policy available on the Rio Tinto website.	NP	NR

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
180	<i>Water Services Act</i> Section 12 (Applicable until April 2020)	Clause 5.3.4	If the licensee enters into an agreement that excludes, modifies or restricts the terms and conditions of the license or the requirements of the <i>Code of Conduct</i> , the licensee must publish an annual report containing the information specified.	4	Refer obligation 179.	NP	NR
181	<i>Water Services Act</i> Section 12	Clause 6.3.1	If the licensee is appointed as the supplier of last resort for a designated area in relation to the provision of a particular water service, the licensee must perform the functions of a supplier of last resort, comply with the duties imposed by the Act and carry out its operations under or for the purpose of the last resort plan in accordance with the Act.	4	The auditor confirmed with Robe River's Specialist Regulatory Compliance that Robe River was not appointed as a supplier of last resort.	N/A	N/A
182	<i>Water Services Act</i> Section 12	Clause 4.4.1(b)	If the licensee provides a water service outside of the operating area the licensee must apply to amend the licence unless otherwise notified by the ERA.	4	The auditor confirmed by interview with Robe River's Specialist Regulatory Compliance, review of Asset Management System documentation and observation that Robe River does not provide a water service outside of the operating area set out in Plan Number: OWR-OA-308.	NP	NR
183	<i>Water Services Act</i> Section 12 (Applicable until April 2020)	Clause 5.4.3	The licensee must comply with the ERA's Financial Hardship Policy Guidelines as they apply to the licensee.	4	Robe River has a Financial Hardship and Payment Difficulty Policy covering all sites, including Pannawonica, although no billing applies to this site. The Policy complied with the ERA's Financial Hardship Policy Guidelines. The initial policy was approved by the ERA on 15 June 2015 and was updated, and approved by the ERA on 22 March 2018. As there was no billing, the policy was no longer required from 1 July 2018 and this was confirmed by the ERA on 29 May 2018 and re-confirmed on 20 January 2020.	A	1

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
184	<i>Water Services Act</i> Section 12	Clause 7.1.1	Where the licensee provides potable water, the licensee must enter into a Memorandum of Understanding with the Department of Health as soon as practicable after the commencement date or as otherwise agreed with Department of Health.	4	The auditor sighted the Memorandum of Understanding ('MOU') between Department of Health ('DOH') and Robe River Mining Company Pty Ltd for Drinking Water dated 31 January 2020. DOH had agreed to defer finalisation until the Australian Drinking Water Guidelines were finalised. This obligation is documented in the Rio Tinto (WA) Pilbara Utilities Water Services Guidance Note.	A	1
184A	<i>Water Services Act</i> Section 12 (Applicable from May 2020)	Clause 7.1.2	Where the licensee provides sewerage services, the licensee must enter into a Memorandum of Understanding with the Department of Health as soon as practicable after the commencement date or as otherwise agreed with Department of Health.	4	Robe River is not required by the ERA to have an MOU with DOH for sewerage services as there are less than 400 customers.	NP	NR
184B	<i>Water Services Act</i> Section 12 (Applicable from May 2020)	Clause 7.1.3	If the licensee provides both potable water and sewerage services, the licensee must enter into a separate Memorandum of Understanding with the Department of Health in respect of each of the potable water service and sewerage service.	4	There is a separate MOU for potable water as per obligation 184. This obligation is documented in the Rio Tinto (WA) Pilbara Utilities Water Services Guidance Note. As per obligation 185, a separate MOU for sewerage services is not required.	A	1
185	<i>Water Services Act</i> Section 12	Clause 7.1.4	A Memorandum of Understanding must comply with the specified requirements in relation to legal standing of the document and compliance audits by the Department of Health.	4	The auditor sighted the Memorandum of Understanding ('MOU') between Department of Health ('DOH') and Robe River Mining Company Pty Ltd for Drinking Water dated 31 January 2020. The document complies with the legal standing required. There have been no compliance audits in the audit period. This obligation is documented in the Rio Tinto (WA) Pilbara Utilities Water Services Guidance Note.	A	1

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
186	<i>Water Services Act</i> Section 12	Clause 7.1.5	The licensee must comply with the terms of a Memorandum of Understanding.	4	<p>The auditor reviewed the Annual Reports required by the MOU executed in January 2020 and voluntarily provided for the years 2016/17, 2017/18 and 2018/19, and confirmed the MOU was complied with. The report confirmed compliance with the following terms:</p> <ul style="list-style-type: none"> • Provision of an annual report on the required drinking water quality information for the areas covered in the MOU. • The MOU is available on the website. • All materials and substances used in contact with drinking water are approved by the Department of Health. • Regular meetings are conducted between Utilities and the Department of Health in relation to Drinking Water Quality matters. • Utilities recognises and supports the ongoing work of the Advisory Committee for the Purity of Water. • Utilities has a documented incident management protocol for dealing with water quality incidents. • The Australian Drinking Water Guidelines published by the National Health and Medical Research Council. <p>This obligation is documented in the Rio Tinto (WA) Pilbara Utilities Water Services Guidance Note, the Drinking Water Quality Risk Management Plan – Utilities water supply system (Towns) and the MOU.</p>	A	1
187	<i>Water Services Act</i> Section 12	Clause 7.1.6	The licensee must publish in the form agreed with the Department of Health, a Memorandum of Understanding and any amendments to a Memorandum of	4	The auditor confirmed the MOU has been published on the Robe River website within one month of signing.	A	1

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
			Understanding within one month of signing or making the amendment. (Potable water and sewerage services).		This obligation is documented in the Rio Tinto (WA) Pilbara Utilities Water Services Guidance Note and the MOU.		
188	Water Services Act Section 12	Clause 7.1.7	The licensee must publish the audit report on compliance with its obligations under a Memorandum of Understanding on its website within one month of the completion of the audit. frequency specified by the Department of Health.	4	The auditor confirmed by interview with Robe River's Specialist Regulatory Compliance that there have been no DOH audits to date. This obligation is documented in the Rio Tinto (WA) Pilbara Utilities Water Services Guidance Note and the Drinking Water Quality Risk Management Plan – Utilities water supply system (Towns).	A	NR
189	Water Services Act Section 12	Clause 7.1.8	The licensee must publish, in a form agreed with the Department of Health, any other reports required by the Department of Health or required by a Memorandum of Understanding on the licensee's website, at a reporting frequency specified by the Department of Health.	4	The Annual Reports required by the MOU have been published on the Robe River website. This obligation is documented in the Rio Tinto (WA) Pilbara Utilities Water Services Guidance Note, the Drinking Water Quality Risk Management Plan – Utilities water supply system (Towns) and the MOU.	A	1
190	Water Services Act Section 12	Schedule 2	The licensee must comply with the standards set out in Schedule 2 of the licence.	4	From review of the Performance Reports to the ERA for 2016/17, 2017/18, 2018/19, and 2019/20, and a register kept of water flow/pressure testing annually, the auditor confirmed the water flow rate and pressure meet the performance standards in Schedule 2 of the licence. The required performance standards are documented in the Asset Management Plan.	A	1

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
Water Services Code of Practice (Family Violence) 2020⁷.							
191	Clause 5(1) (Applicable from March 2021)	Clause 4.1.1	The Licensee must have a family violence policy that sets out the matters specified in clause 5(1).	4	The auditor confirmed with Robe River's Specialist Regulatory Compliance that a family violence policy has been established by the due date of 9 June 2021. The auditor sighted the "Family violence guidance for residential water services customers" document on the website and confirmed it sets out the required matters.	A	1
192	Clause 5(2) (Applicable from March 2021)	Clause 4.1.1	The licensee must have a family violence policy before the end of the six- month period starting on either: 9 December 2020; or if the day of the grant of the licensee's licence is after 9 December 2020, the day of the grant of the licensee's licence.	4	Refer obligation 191.	A	1
193	Clause 6 (Applicable from March 2021)	Clause 4.1.1	A licensee must publish its family violence policy on its website and provide a hard copy of the policy to a customer on request and at no charge.	4	The auditor confirmed the policy is published on the website and is also available in hardcopy at no charge.	A	1
194	Clause 7 (Applicable from March 2021)	Clause 4.1.1	A licensee must review its family violence policy at least once in every 5- year period, and additionally, if directed to do so by the Minister.	4	As the policy was first issued in June 2021, a further review is not due. The policy states that it will be reviewed at least every 5 years.	A	NR
195	Clause 8(1) (Applicable from March 2021)	Clause 4.1.1	A licensee must maintain adequate records in relation to compliance with this code or any policy made under the code.	4	The auditor confirmed with Robe River's Specialist Regulatory Compliance and by review of the family violence policy and general record-keeping of Robe River, that adequate records would be maintained. As the audit period is to 30 April 2021, the policy had not come into effect.	A	NR

⁷ This Water Services Code of Practice (Family Violence) 2020 applies the Code to a licensee that provides a water service to a residential customer. A "residential customer" in the Code means a customer who uses the place where a water service is provided, solely or primarily as the customer's dwelling

No ³	Legislative Reference	Licence Condition	Description	Audit Priority ⁴	Systems, Processes, Controls in Place to Comply with Licence (including any recommendations)	Adequacy of Controls Rating ⁵	Compliance Rating ⁶
196	Clause 8(2) (Applicable from March 2021)	Clause 4.1.1	If the licensee is not a government organisation according to the <i>State Records Act 2000 (WA)</i> , a record that relates to a customer, must be retained for at least 7 years after the last communication between the licensee and the customer, or water services ombudsman. If the record does not relate to a customer, then the record must be kept for at least 7 years after the record is made.	4	The auditor confirmed with Robe River's Specialist Regulatory Compliance and by review of the family violence policy and general record-keeping of Robe River, that records are maintained for at least 7 years. As the audit period is to 30 April 2021, the policy had not come into effect. This obligation is documented in the Robe River Data Retention policy.	A	NR
197	Clause 9 (Applicable from March 2021)	Clause 4.1.1	When a customer affected by family violence first contacts a licensee about a particular matter relating to the family violence, the licensee must inform the customer of the existence and operation of the licensee's complaints procedure under clause 46 of the Water Services Code of Conduct (Customer Service Standards) 2018.	4	The auditor confirmed with Robe River's Specialist Regulatory Compliance and by review of the family violence policy of Robe River, that the customer would be informed of the customer complaints procedure. As the audit period is to 30 April 2021, the policy had not come into effect. The "Family violence guidance for residential water services customers" documents that the licensee will inform the customer of assistance available including the complaints procedure.	A	NR
198	Clause 10 (Applicable from March 2021)	Clause 4.1.1	A licensee must ensure that its website contains a link that provides access to the current version of the code as it appears on the website that is maintained by or on behalf of the Western Australian Government and that provides public access to electronic versions of Western Australian legislation.	4	The auditor sighted the "Family violence guidance for residential water services customers" document on the website and confirmed it includes a link to the Code of Practice on the government website. This is documented in the "Family violence guidance for residential water services customers" document.	A	1

3.7 Audit Recommendations

Table of Current Audit Non- Compliances and Recommendations

A. Resolved during current audit period

Recommendation (no./year)	Non-Compliance/Controls Improvement (Rating/Licence obligation ref. and obligation/Non-compliance or inadequacy of control)	Date Resolved (& management action taken)	Auditor's Comments
	Nil		

B. Unresolved at end of current audit period

Recommendation (no./year)	Non-Compliance/Controls Improvement (Rating/Licence obligation ref. and obligation/Non-compliance or inadequacy of control)	Auditor's Recommendation	Action taken by the licensee by end of audit period
	Nil		

4. Asset Management System Review

4.1 Description of Infrastructure

Robe River has a Water Services Licence, issued by the Economic Regulation Authority ('ERA') under the *Water Services Act 2012* ('Act'), for the provision of potable water supply and sewerage services in the township of Pannawonica in the Pilbara region of WA, near the Robe River, about 200 km south-east from Karratha. The township has approximately 400 residential and commercial properties which were built in 1970 to provide accommodation for mining staff, their families and the small number of non-mining support personal.

The operating area includes: the bore field; transmission pipeline (potable) to the town; distribution system (potable) within the town; sewerage and wastewater services assets within the town; and pipeline (sewerage and wastewater) from the town to the Waste Water Treatment Plant.

The potable water and sewerage systems have been in service for 40+ years and are critical to the wellbeing of the township and operation of the mine. The assets are well established and the systems understood by the operating staff.

Under the Act, water services' licensees are required to provide reports on an operational audit ('audit') and an effectiveness review of their asset management system ('review') once every 24 months, or another period that has been specified by the ERA.

The audit and review approach is based on the compliance obligations set out in the Licence, applicable legislation, regulatory guidelines (Water Compliance Reporting Manual 2020 and previous version 2018 and 2017) and the 2019 Audit and Review Guidelines: Water Licences.

4.2 Objectives and Scope

The objective of the review was to assess the adequacy and effectiveness of the asset management system in place for the undertaking, maintenance and monitoring of the licensee's assets.

The scope of the review included an assessment of the adequacy and effectiveness of the asset management system by evaluating the key processes of:

- Asset planning
- Asset creation/acquisition
- Asset disposal
- Environmental analysis
- Asset operations
- Asset maintenance
- Asset management information system
- Risk management
- Contingency planning
- Financial planning
- Capital expenditure planning
- Review of the asset management system.

The highest priority asset components based on inherent risk and the previous review were:

- Asset management planning (high inherent risk); and
- Environmental analysis (high inherent risk).

This audit and review covers the period 1 May 2017 to 30 April 2021. The previous audit and review was from 9 April 2015 to 30 April 2017.

4.3 Asset Management Process and Performance Rating Scales

The adequacy of process policy and definition and the performance of the key processes were assessed using the scales described in the tables below. The overall effectiveness rating for each asset management process is based on a combination of the process and policy adequacy rating and the performance rating.

Asset Management Process and Policy Definition - Adequacy ratings

RATING	DESCRIPTION	CRITERIA
A	Adequately defined	<ul style="list-style-type: none"> Processes and policies are documented. Processes and policies adequately document the required performance of the assets. Processes and policies are subject to regular reviews, and updated where necessary. The asset management information system(s) are adequate in relation to the assets that are being managed.
B	Requires some improvement	<ul style="list-style-type: none"> Process and policy documentation require improvement. Processes and policies do not adequately document the required performance of the assets. Reviews of processes and policies are not conducted regularly enough. The asset management information system(s) requires minor improvements (taking into consideration the assets being managed).
C	Requires significant improvement	<ul style="list-style-type: none"> Process and policies are incomplete or require substantial improvement. Processes and policies do not document the required performance of the assets. Processes and policies are considerably out of date. The asset management information system(s) requires substantial improvement (taking into consideration the assets being managed).
D	Inadequate	<ul style="list-style-type: none"> Processes and policies are not documented. The asset management information system(s) is not fit for purpose (taking into consideration the assets being managed).

Asset Management Performance Ratings

RATING	DESCRIPTION	CRITERIA
1	Performing effectively	<ul style="list-style-type: none"> The performance of the process meets or exceeds the required levels of performance. Process effectiveness is regularly assessed, and corrective action taken where necessary.
2	Opportunity for improvement	<ul style="list-style-type: none"> The performance of the process requires some improvement to meet the required level. Process effectiveness reviews are not performed regularly enough. Process improvement opportunities are not implemented.
3	Corrective action required	<ul style="list-style-type: none"> The performance of the process requires significant improvement to meet the required level. Process effectiveness reviews are performed irregularly, or not at all. Process improvement opportunities are not implemented.
4	Some action required	<ul style="list-style-type: none"> Process is not performed, or the performance is so poor that the process is considered to be ineffective.

4.4 Status of Previous Review Recommendations

The previous review covered the period 9 April 2015 to 30 April 2017 and was reported in September 2017. There were no recommendations.

4.5 Summary of Asset Management System Effectiveness Ratings

The review's assessment of the asset management system process and policy definitions and their effectiveness, based on the ratings scale in Section 4.4, is shown in the table below.

Section 4.7 provides further details of the current rating results for each process in the asset management system.

Summary of Asset Management Performance Ratings

Process and Policy Definition – Adequacy Rating	Performance Rating for Effectiveness Criteria					Total
	Rating	1 Performing effectively	2 Opportunity for improvement	3 Corrective action required	4 Some action required	
	A -Adequately defined	56	2	-	-	58
	B – Requires some improvement	-	-	-	-	-
	C – Requires significant improvement	-	-	-	-	-
	D – Inadequate	-	-	-	-	-
Total	56	2	-	-	58	

Asset Management System Performance Ratings

ASSET MANAGEMENT SYSTEM COMPONENT & EFFECTIVENESS CRITERIA	Process and Policy rating				Performance rating				
	Adequately defined	Requires some improvement	Requires significant improvement	Inadequate	Performing effectively	Opportunity for improvement	Corrective action required	Serious action required	Not Rated
	A	B	C	D	1	2	3	4	NR
1. Asset planning	A				1				
1.1 Asset management plan covers the processes in this table.	A				1				
1.2 Planning process and objectives reflect the needs of all stakeholders and are integrated with business planning.	A				1				
1.3 Service levels are defined in the asset management plan.	A				1				
1.4 Non-asset options (e.g. demand management) are considered.	A				1				
1.5 Lifecycle costs of owning and operating assets are assessed.	A				1				

ASSET MANAGEMENT SYSTEM COMPONENT & EFFECTIVENESS CRITERIA	Process and Policy rating				Performance rating				
	Adequately defined	Requires some improvement	Requires significant improvement	Inadequate	Performing effectively	Opportunity for improvement	Corrective action required	Serious action required	Not Rated
	A	B	C	D	1	2	3	4	NR
1.6 Funding options are evaluated.	A				1				
1.7 Costs are justified and cost drivers identified.	A				1				
1.8 Likelihood and consequences of asset failure are predicted.	A				1				
1.9 Asset management plan are regularly reviewed and updated.	A				1				
2. Asset creation/ acquisition	A				1				
2.1 Full project evaluations are undertaken for new assets, including comparative assessment of non-asset solutions.	A				1				
2.2 Evaluations include all life-cycle costs.	A				1				
2.3 Projects reflect sound engineering and business decisions.	A				1				
2.4 Commissioning tests are documented and completed.	A				1				
2.5 Ongoing legal/environmental/safety obligations of the asset owner are assigned and understood.	A				1				
3. Asset disposal	A				1				
3.1 Under-utilised and under-performing assets are identified as part of a regular systematic review process.	A				1				
3.2 The reasons for under-utilisation or poor performance are critically examined and corrective action or disposal undertaken.	A				1				
3.3 Disposal alternatives are evaluated.	A				1				
3.4 There is a replacement strategy for assets.	A				1				
4. Environmental analysis	A					2			
4.1 Opportunities and threats in the asset management system environment are assessed.	A				1				
4.2 Performance standards (availability of service, capacity, continuity, emergency response, etc) are measured and achieved.	A				1				
4.3 Compliance with statutory and regulatory requirements.	A					2			
4.4 Achievement of customer service levels.	A				1				

ASSET MANAGEMENT SYSTEM COMPONENT & EFFECTIVENESS CRITERIA	Process and Policy rating				Performance rating				
	Adequately defined	Requires some improvement	Requires significant improvement	Inadequate	Performing effectively	Opportunity for improvement	Corrective action required	Serious action required	Not Rated
	A	B	C	D	1	2	3	4	NR
5. Asset operations	A					2			
5.1 Operational policies and procedures are documented and linked to service levels required.	A				1				
5.2 Risk management is applied to prioritise operations tasks.	A				1				
5.3 Assets are documented in an Asset Register including asset type, location, material, plans of components, and an assessment of assets' physical/structural condition.	A					2			
5.4 Accounting data is documented for assets.									
5.5 Operational costs are measured and monitored.	A				1				
5.6 Staff resources are adequate and staff receive training commensurate with their responsibilities.	A				1				
6. Asset maintenance	A				1				
6.1 Maintenance policies and procedures are documented and linked to service levels required.	A				1				
6.2 Regular inspections are undertaken of asset performance and condition.	A				1				
6.3 Maintenance plans (emergency, corrective and preventative) are documented and completed on schedule.	A				1				
6.4 Failures are analysed and operational/maintenance plans adjusted where necessary.	A				1				
6.5 Risk management is applied to prioritise maintenance tasks.	A				1				
6.6 Maintenance costs are measured and monitored.	A				1				
7. Asset Management Information System	A				1				
7.1 Adequate system documentation for users and IT operators.	A				1				
7.2 Input controls include appropriate verification and validation of data entered into the system.	A				1				
7.3 Security access controls appear adequate, such as passwords.	A				1				
7.4 Physical security access controls appear adequate.	A				1				

ASSET MANAGEMENT SYSTEM COMPONENT & EFFECTIVENESS CRITERIA	Process and Policy rating				Performance rating				
	Adequately defined	Requires some improvement	Requires significant improvement	Inadequate	Performing effectively	Opportunity for improvement	Corrective action required	Serious action required	Not Rated
	A	B	C	D	1	2	3	4	NR
7.5 Data backup procedures appear adequate and backups are tested.	A				1				
7.6 Computations for licensee performance reporting are accurate.	A				1				
7.7 Management reports appear adequate for the licensee to monitor licence obligations.	A				1				
7.8 Adequate measures to protect asset management data from unauthorised access or theft by persons outside the organisation.	A				1				
8. Risk management	A				1				
8.1 Risk management policies and procedures exist and are being applied to minimise internal and external risks associated with the asset management system.	A				1				
8.2 Risks are documented in a risk register and treatment plans are actioned and monitored.	A				1				
8.3 The probability and consequences of asset failure are regularly assessed.	A				1				
9. Contingency planning	A				1				
9.1 Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks.	A				1				
10. Financial planning	A				1				
10.1 The financial plan states the financial objectives and identifies strategies and actions to achieve those.	A				1				
10.2 The financial plan identifies the source of funds for capital expenditure and recurrent costs.	A				1				
10.3 The financial plan provides projections of operating statements (profit and loss) and statement of financial position (balance sheets).	A				1				
10.4 The financial plan provides firm predictions on income for the next five years and reasonable indicative predictions beyond this period.	A				1				
10.5 The financial plan provides for the operations and maintenance, administration and capital expenditure requirements of the services.	A				1				

ASSET MANAGEMENT SYSTEM COMPONENT & EFFECTIVENESS CRITERIA	Process and Policy rating				Performance rating				
	Adequately defined	Requires some improvement	Requires significant improvement	Inadequate	Performing effectively	Opportunity for improvement	Corrective action required	Serious action required	Not Rated
	A	B	C	D	1	2	3	4	NR
10.6 Large variances in actual/budget income and expenses are identified and corrective action taken where necessary.	A				1				
11. Capital expenditure planning	A				1				
11.1 There is a capital expenditure plan covering works to be undertaken, actions proposed, responsibilities and dates.	A				1				
11.2 The capital expenditure plan provides reasons for capital expenditure and timing of expenditure.	A				1				
11.3 The capital expenditure plan is consistent with the asset life and condition identified in the asset management plan.	A				1				
11.4 There is an adequate process to ensure that the capital expenditure plan is regularly updated and implemented..	A				1				
12. Review of asset management system	A				1				
12.1 A review process is in place to ensure that the asset management plan and the asset management system described in it remain current.	A				1				
12.2 Independent reviews (e.g. internal audit) are performed of the asset management system.	A				1				

4.6 Detailed Review Observations

Item no.	Component and Effectiveness Criteria (refer criteria in Audit Guidelines)	Observations and results (including any potential improvements)			
		Process Rating ⁸	A	Performance Rating ⁹	1
1	ASSET PLANNING				
1.1	Asset management plan covers key requirements.	<p>The Asset Management Improvement Plan (AMIP) – Water and Wastewater Services 2021 (RTIO-AM-0099745, March 2021) sets out in section 2 how each of the Asset Management components are implemented. Robe River approaches the management of all assets in a consistent way and the information in section 2 provides an interpretation of how each of the ERA Asset Management components are delivered.</p> <p>Asset Management Responsibilities by role are identified in section 1.6. Appendix 8 also outlines Group Accountabilities and Central Support for Asset Management Activities.</p> <p>During the course of the review, the following key roles referenced in the AMIP provided input:</p> <ul style="list-style-type: none"> • Principal Advisor Water with responsibility for the AMIP. • Superintendent Long Term Planning & Reliability manages long term planning and reliability engineering. • Specialist Engineer Water has responsibility for managing the water and wastewater capital projects portfolio. • Water Operations Specialist has responsibility for implementing operating plans (including the Drinking Water Quality Management ('DWQM') System). • Environmental Superintendent/Advisor has responsibility for regulatory, licencing and reporting requirements. • Specialist Regulatory Compliance, Utilities Operations has overall responsibility for regulatory compliance. • Superintendent Utilities (based in Pannawonica) has responsibility for onsite operations. 			
1.2	Planning process and objectives reflect the needs of all stakeholders and is integrated with business planning.	<p>Business and asset planning processes are described commencing with the Iron Ore Group Strategy, which informs the Business Plan for a 5 year horizon (at business unit level the framework plan to achieve objectives), which informs the Annual Plan.</p> <p>As an operational input to asset management practices, site reliability plans (for operating and maintenance) are linked to risk assessments (via site asset risk and contingency plans).</p> <p>Field-based staff provide feedback into the Asset Management Planning processes through daily start-up meetings which provide a mechanism to elevate operations and maintenance experience and observations. When capital</p>			

⁸ Process ratings: A=adequately defined, B=requires some improvement, C=requires significant improvement, D=inadequate.

⁹ Performance ratings: 1=performing effectively, 2=opportunity for improvement, 3=corrective action required, 4=serious action required

Item no.	Component and Effectiveness Criteria (refer criteria in Audit Guidelines)	Observations and results (including any potential improvements)
		improvement projects are underway, stakeholder management plans are implemented to consider the planning of works with normal operation and manage the introduction of new works into operations.
1.3	Service levels are defined.	<p>Service levels are defined in the AMIP including:</p> <ul style="list-style-type: none"> • DWQM – compliance with Department of Health ('DOH') Memorandum of Understanding ('MOU'). • Less than 20 water main breaks per 100km of main. • % of properties receiving pressure and flow outside of performance standard (minimum 15m, max 100m, min 20L/min) • Less than 40 sewer breaks/chokes per 100km of main.
1.4	Non-asset options (e.g. demand management) are considered.	<p>Water conservation information is provided in the RT-Pilbara-Pannawonica Welcome Pack for residents. However, as the overall population at Pannawonica has reduced with roles moved centrally, there is no driver for capital investment to address any growth in demand. While residents at some of the Pilbara towns pay a tiered scale for water consumption, the Pannawonica residents are not charged for water consumption.</p> <p>GN-A029 "Asset Management Tactics Development and Management" outlines the procedures for examining asset performance and failure events to adapt maintenance practices, spares management and equipment selection—which leads to deliberate decision making about efforts to manage asset maintenance or run to failure (and replace) strategies based on asset criticality.</p>
1.5	Lifecycle costs of owning and operating assets are assessed.	Life cycle costs are planned for as part of the Asset Creation process (refer 2.2) and through the asset lifecycle, operating and maintenance costs are measured and replacement strategies reviewed annually. Refer section 3 of the AMIP – Item K (Asset Lifecycle Planning).
1.6	Funding options are evaluated.	Water consumption charges are not payable by the residents of Pannawonica. The costs of providing water and wastewater services at Pannawonica are treated as a cost of the mining operation and funded as an operating cost of the mining business.
1.7	Costs are justified and cost drivers identified.	<p>Operations and maintenance costs are reported quarterly with variance from budget to actual identified for review by management (a sample of the report was sighted).</p> <p>Budgeting is zero-based budgeting with cost drivers justified to provide safe, efficient and reliable water and wastewater services.</p>
1.8	Likelihood and consequences of asset failure are predicted.	The RTIO-AM-0180730 Water & Wastewater Asset Risk Contingency Pannawonica Town shows the predicted likelihood, consequence and risk of various asset failures together with existing contingency plans (for possible failure events).
1.9	Plans are regularly reviewed and updated.	The AMIP states that the plan and linked documents are to be reviewed annually, although the AMIP document revision history indicates more recently this review is every second year. The most recent update is dated March 2021.

Item no.	Component and Effectiveness Criteria (refer criteria in Audit Guidelines)	Observations and results (including any potential improvements)			
		Appendix 7 of the AIMP identifies linked documents such as the MOU for Drinking Water Quality Management and the WWTP Licence. Some minor errors in the "Next Update" information were identified and shared with Robe River staff for update in the next AMIP.			
2	ASSET CREATION/ ACQUISITION	Process Rating	A	Performance Rating	1
2.1	Full project evaluations are undertaken for new assets, including comparative assessment of non-asset solutions.	<p>The RIO-AM-0170583 Asset Strategy for Ageing W & WW Towns notes that no town growth is forecast for Pannawonica with the population remaining constant for the foreseeable future. Consequently, there are no major planned infrastructure upgrades for 10 years. Asset creation is about maintaining service through condition-based risk assessment of assets. The strategy discusses the asset classes of bores, water tanks, water mains, chlorination systems, water pump stations, sewer mains, sewer pump stations and WWTPs. The age profile across all of the Rio Tinto Iron Ore ('RTIO') towns for the asset classes is briefly discussed together with typical asset lives, availability of contingencies and spares and frequency of routine inspection.</p> <p>The asset creation process is presented in the Asset Management Improvement Plan. The process includes use of an Initiation Form to describe the problem statement (or opportunity), describe the consequence of the project not proceeding and a series of entries enables a project priority to be determined.</p> <p>The next phase of project evaluation is undertaken using the 'Blue Sheet' planning tool which details risks, assesses options and describes the business justification (e.g. health, safety, environment, reliability, compliance or regulatory) The Bluesheet requires approval of the Maintenance Manager before proceeding to the next step.</p> <p>The final step in project approval is the Capital Expenditure Approval ('CEA'). This is the project business case which incorporates information on approvals (e.g. Environmental Approval) and the Lifecycle Costing which is reviewed by Business Analysts.</p> <p>During the site visit a recent project involving replacement of a tank at the WWTP was discussed. The Blue Sheet and the CEA documents were provided. This demonstrated consideration of alternative options (including doing nothing) and identified the drivers for the project (being forecast failure of the tank and the compliance and safety risks).</p>			
2.2	Evaluations include all life-cycle costs.	Lifecycle costs are assessed as part of the Capital Expenditure Approval, considering the upfront capital and ongoing costs of operating and maintaining.			
2.3	Projects reflect sound engineering and business decisions.	The tank replacement project discussed above and a replacement chlorinator project at the tank site both demonstrated sound business decisions in terms of understanding drivers, risks and decision processes. The engineering decisions were sound – incorporating consideration of repair versus replacement, the need for bypass works during the project to maintain services and compliance and brought in knowledge of similar projects (in terms of repair methods, including cost and the short asset life of the repair versus replacement).			
2.4	Commissioning tests are documented and completed.	The Asset Management Guideline 'Operational Readiness' (GN-A016) describes the commissioning process. A template (RTIO Utilities Small Project - OR Checklist) was also provided. The operational readiness concept incorporates commissioning (as described in GN-A016) and the assembly of project documents (e.g. drawings and			

Item no.	Component and Effectiveness Criteria (refer criteria in Audit Guidelines)	Observations and results (including any potential improvements)			
		operating manuals), SAP set-up, development of maintenance strategies, delivery of any specialist workshop equipment and development of health and safety procedures.			
2.5	Ongoing legal/environmental/safety obligations of the asset owner are assigned and understood.	<p>The LAORS database contains a centralised repository for the ongoing legal, regulatory and safety obligations and these are tracked using the Utilities Statutory Reporting & Communications Guide and quarterly status reports. The LAORS database was viewed on-line. The AMIP also lists the legal/environmental and safety obligations in Appendix 7 and refers to these as linked documents. This includes:</p> <ul style="list-style-type: none"> • Pannawonica Drinking Water Source Protection Plan • Pannawonica Catchment Management Plan • Groundwater Operating Strategy for Pannawonica. • Mosquito Management Plan for Pannawonica (pending). • Utilities Chlorine Management Plan • WWTP Operating Licence for Pannawonica • Water Services Licence. 			
3	ASSET DISPOSAL	Process Rating	A	Performance Rating	1
3.1	Under-utilised and under-performing assets are identified as part of a regular systematic review process.	<p>The AMIP describes activities to identify under-utilized and under-performing assets. No underutilised assets or asset disposals were identified during the review period. Under-performing assets are identified through maintenance tasks, condition monitoring and day to day operations.</p> <p>No assets were disposed of for utilisation or performance reasons during the review period.</p>			
3.2	The reasons for under-utilisation or poor performance are critically examined and corrective action or disposal undertaken.	<p>Performance issues are reviewed by the Maintenance and Maintenance Engineering teams. The response is either a maintenance task, condition monitoring finding or a planned condition review.</p> <p>The process for disposal is referred to in the Capital Accounting Manual. Details are included in the Engineering and Asset Management Intranet page – Materials Management – Asset Disposals.</p> <p>Guidance Note GN-A029 Asset Management Tactics Development and Management is also relevant. This is mostly about developing maintenance tactics but triggers also include defects and incident investigation outcomes.</p>			
3.3	Disposal alternatives are evaluated.	<p>Refer Asset Creation section above. The general strategy adopted is rolling replacement, but strategies are assessed re do nothing, refurbish, rolling upgrade/replacement or complete upgrade/replacement. Business cases look at the appropriate strategy for each project.</p> <p>For Pannawonica, refurbishment has limited application for small diameter mains and sewers compared to replacement costs.</p>			
3.4	There is a replacement strategy for assets.	<p>Refer Asset Creation section above. The risk and condition-based replacement strategy is in place. As the Pannawonica town is forecast to have a remaining life in the order of 15 years (based on the mining operations it supports) this influences decisions about replacement (for shorter asset lives such as pumps) versus</p>			

Item no.	Component and Effectiveness Criteria (refer criteria in Audit Guidelines)	Observations and results (including any potential improvements)			
		repair/refurbishment (for longer asset lives such as pipelines). This is demonstrated for the AC water mains at Pannawonica which are being managed through a repair program whilst this does not impact service levels to customers.			
4	ENVIRONMENTAL ANALYSIS	Process Rating	A	Performance Rating	2
4.1	Opportunities and threats in the system environment are assessed.	Opportunities and threats are discussed in the AMIP – threats assessed in terms of asset risk assessments (as part of Site Reliability Plans), drinking water quality risk assessments (DWQM Plans), the Utilities risk register (for external risks) and chlorine system risk assessment.			
4.2	Performance standards (availability of service, capacity, continuity, emergency response, etc.) are measured and achieved.	Drinking water quality testing achieved 100% compliance for microbiological and health related chemical parameters for Pannawonica. Unplanned service outages are recorded in an Outages Database – no unplanned outages were recorded for Pannawonica during the review period. A copy of report tracking performance of the WWTP effluent quality against internal standards was provided. The WWTP licence does not include effluent quality standards, but Robe River has adopted Australian and New Zealand Environment and Conservation Council ('ANZECC') targets to assess the discharge against.			
4.3	Compliance with statutory and regulatory requirements.	<p>Annual environmental compliance reports are provided in relation to the Wastewater Treatment Plant (all compliant) and annual reporting is also provided on drinking water quality in line with the DoH MoU (all compliant). Annual groundwater monitoring summaries are provided to the Department of Environment and Water Regulation ('DWER') as part of the Groundwater Licence and every 3 years a Groundwater Monitoring Review is submitted.</p> <p>Performance reports are also provided to ERA. These are publicly available on the Robe River website.</p> <p>On visiting the Pannawonica Waste Water Treatment Plant ('WWTP'), the Engineer observed the discharge to the infiltration trench. Discharge to the infiltration trench is within the conditions of the WWTP licence. However, the infiltration trench was overflowing at the time of the site visit. The discharge contributes to a downstream creek system. Ponding water can be seen in the creek system adjacent to the road into Pannawonica approximately 1km from the WWTP although recent rains have likely also contributed to this. The discharge is directed away from the Pannawonica town. However, cattle were observed grazing nearby.</p> <p>The auditor noted that discharge from the WWTP has been assessed by DWER as low risk in terms of potential environmental impact to surrounding land when the licence was granted. The licence conditions include measures to monitor potential impacts from discharge by requiring Robe River to monitor the water quality (quarterly), quantity (monthly) and water quality of three neighbouring monitoring bores (quarterly). The WWTP Licence (Part V Licence L7455 Pannawonica Town WWTP) does not require any reporting about overflow from the infiltration channel.</p> <p>The "Improvement Required" rating is based on the uncertainty about whether the WWTP discharge is within the intent of the WWTP licence. Robe River will discuss this situation with DWER and confirm.</p>			
4.4	Achievement of customer service levels.	An Outages database records any unplanned interruptions to water and wastewater services. There have been no interruptions in the review period. Service pressures (between 15m and 100m) and flow (min 20L/minute) are not			

Item no.	Component and Effectiveness Criteria (refer criteria in Audit Guidelines)	Observations and results (including any potential improvements)			
		measured for Pannawonica as the simple gravity supply system ensures the level of pressure supplied to customers remains within this range.			
5	ASSET OPERATIONS	Process Rating	A	Performance Rating	2
5.1	Operational policies and procedures are documented and linked to service levels required.	<p>The AMIP refers to the Water and Wastewater Site Reliability Plans and Operational Procedures as the documents which provide operational policies and procedures linked to service levels.</p> <p>The Reliability Plans provide an overview of the operation of the water and wastewater systems, outline the relevant regulatory requirements (DWQM Plan and Wastewater Treatment Plan ('WWTP') Licence), list the key performance indicators (pressure, flow, drinking water quality, water main breaks, sewer breaks and chokes), list critical assets (from the Asset Risk and Contingency Plan) and the resulting prioritisation of operational tasks. Operating and Maintenance (;O&M;) procedures are listed with reference to SAP system for access to the actual procedures. The operating protocols briefly outline the responsibility for remote and local operations, responsibilities for developing, undertaking and reviewing O&M plans, responsibility for attending to critical alarms and attending to incidents.</p> <p>A table at the end of the Reliability plan lists the service level, the Key Performance Indicators ('KPIs') and performance against the service level KPI. Note the Wastewater Site Reliability plan has not updated the performance against the service level KPI since 2015/16 (refer table in section 7 – RTIO-AM-0180727 Site Reliability Plan Pannawonica WWTP).</p> <p>The document RTIO-HSE-0018427 WWTP Operations and Maintenance Guide outlines O&M activities for the WWTP.</p> <p>A number of separate Standard Work Procedures ('SWP') were also provided (e.g. SWPs for Sewer Pump Station inspections and Chlorine Gas Drum Changeout). Typically these include resourcing, training required, tools and PPE required for the task.</p> <p>O&M tasks are loaded into SAP to be carried out. A sample spreadsheet report of planned and corrective tasks was provided for a typical week in Pannawonica (26 April to 1 May 2021).</p> <p>During the site visit the SCADA screens for operation of the water supply were reviewed. The system monitors tank storage levels, operates bores and is used to rotate the use of bores and monitor chlorination. Actions taken if chlorination failure occurs were discussed. The exposure of the bores to flooding in high rainfall was also discussed with the setup in place to temporarily remove trailer mounted switchboards, maintain one bore in operation located on ground less susceptible to flood and use tank storage together with reduced water use campaigns in the town.</p>			
5.2	Risk management is applied to prioritise operations tasks.	O&M tasks are assigned with a priority code. Priority codes (A, B and C) reflect aspects such as asset criticality, regulatory requirements and corrective activities. Efforts are made to schedule a spread of A, B and C tasks each week to avoid over allocation of high priority tasks.			

Item no.	Component and Effectiveness Criteria (refer criteria in Audit Guidelines)	Observations and results (including any potential improvements)		
		Risk assessment documents are prepared for water and wastewater with consequence descriptors and contingencies which may be maintenance, monitoring, use of backups or spares etc. The most recent update of these was April 2021.		
5.3	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.	<p>The Asset Register was viewed on-line. This included asset type, location, material and asset condition fields and accounting data. The asset register did not include pipeline infrastructure.</p> <p>The pipeline assets are managed in a plan format. The latest design drawings for the pipeline assets are readily available on-line. The system (SAP) for recording any maintenance or incidents on a pipeline allows the asset history to be reviewed. There is no online mapping system of <i>pipeline assets and history to assist assessment of any sections which may be subject to recurring events.</i></p>		
5.4	Accounting data is documented for assets.	Accounting data is recorded in the Asset Register and the financial system. Variances in actual to budget income and expenses are reported in the monthly Utilities Cost Report to Rio Tinto's Utilities management group and corrective action is taken as necessary.		
5.5	Operational costs are measured and monitored.	The operational costs are monitored in the monthly Utilities Cost Report, comparing actual and target cost. A sample report was provided showing budget, actual and variance.		
5.6	Staff resources are adequate and staff receive training commensurate with their responsibilities.	<p>Staffing levels at Pannawonica consist of a Mechanical Supervisor plus a team of four people. The Supervisor and teams work on a 6/8 day roster allowing change-over of the Supervisor and team on a regular basis. A staff training matrix was reviewed with most of the teams currently progressing through the Cert 3 in Water Operations (Cert. 1 and 2 are complete along with Chlorine Gas handling and other safety related training).</p> <p>Tracking of completion of O&M tasks allocated each week was discussed. For the sample week provided, it appeared a few tasks were not complete. These are tracked and reallocated in the following week for completion. A sample of the dashboard used to track tasks not completed was provided, together with % resource utilisation which was consistently between 90% and 100%. These indicate consistently low numbers of incomplete tasks and staff resourcing matched well to the scheduled tasks.</p>		
6	ASSET MAINTENANCE		A	1
6.1	Maintenance policies and procedures are documented and linked to service levels required.	Maintenance policies and procedures are documented as part of the Site Reliability Plans (refer description provided under Asset Operations) including:		

Item no.	Component and Effectiveness Criteria (refer criteria in Audit Guidelines)	Observations and results (including any potential improvements)
		<ul style="list-style-type: none"> • RTIO-AM-0167148 Water Infrastructure Maintenance Standard Specification – provided showing maintenance activities required for various equipment and frequency (including run to failure). Last reviewed Apr 2021. • RTIO-AM-0108336 SAP Maintenance Plans - provided showing the steps to load maintenance activities. Last reviewed Nov 2020. • RCM Water Maintenance Tactics Library document also provided listing standard checks and frequency for water and wastewater asset components. <p>As for the operational activities, maintenance tasks are loaded via SAP system and result in a weekly work program which is tracked as described in section 5.1 and 5.5 above.</p> <p>During the site visit, discussion with the local Operations Manager indicated a high familiarity with the water and wastewater assets at Pannawonica. Sites inspected included the wastewater pump station, the wastewater treatment plant, the town potable water tank site and chlorinator and a typical bore. Daily maintenance activities were discussed and the processes for elevating any issues from field crews. All sites were clean and tidy, the assets appeared in good condition, planning was in place for a tank replacement at the WWTP, the maintenance tasks being carried out were demonstrating a proactive approach to managing problems (e.g. the regular cleaning of the WWPS wet well and checks of float level controls at the WWTP tank). There was a good level of awareness of the service objectives (unplanned interruptions) and the intent of the catchment protection objectives were in place.</p>
6.2	Regular inspections are undertaken of asset performance and condition.	<p>Sample spreadsheet report of planned maintenance tasks were provided which included inspection tasks. A significant inspection report for the Pannawonica water tank was provided (2018 inspection).</p> <p>During the site visit, regular inspection tasks for the wastewater pump station and WWTP were discussed. Copies of checklists of activities were obtained (weekly and monthly checklists). The stated aims of the inspections are "To check and inspect equipment for possible future work. These checks are aimed at keeping the plant in operable condition and catching potential breakdowns before they become actual breakdowns. The intention is not to carry out major repairs. Minor short duration repairs may be carried out with the appropriate approval."</p> <p>Typically across the towns the AC water mains are reaching the end of life (the majority of failures occurring on AC mains), many isolation valves do not isolate, and the remaining VC gravity sewers are prone to root intrusion. In the case of Pannawonica, a program of replacements had been completed prior to this review period to address problematic VC sewers, with the remaining VC sewers condition monitored. The AC water mains are still in an acceptable condition at Pannawonica. These are subject to stable pressures due to the gravity supply arrangement from the town tanks and while some leaks occur, these are addressed by repair with minimal impact to customers, as the reticulation system valves are in good condition (having been subject to a replacement program) allowing small shutdowns to take place for repair work.</p>
6.3	Maintenance plans (emergency, corrective and preventative) are	The sample spreadsheet of weekly planned and corrective tasks and dashboard tracking completion verified that maintenance tasks are completed on schedule.

Item no.	Component and Effectiveness Criteria (refer criteria in Audit Guidelines)	Observations and results (including any potential improvements)			
	documented and completed on schedule.				
6.4	Failures are analysed and operational/maintenance plans adjusted where necessary.	The AMIP states that failures are analysed by the Utilities and Asset Management Reliability Assurance teams and Failure Mode and Effect Analysis ('FMEA') reports are produced. An example was discussed, where vibration monitoring of major pump equipment is carried out to predict the need for maintenance before failure occurs.			
6.5	Risk management is applied to prioritise maintenance tasks.	O&M tasks are assigned with a priority code. Priority codes (A, B and C) reflect aspects such as asset criticality, regulatory requirements and corrective activities. Efforts are made to schedule a spread of A, B and C tasks each week to avoid over allocation of high priority tasks.			
6.6	Maintenance costs are measured and monitored.	The AMIP states that O&M costs are monitored in the monthly Utilities Cost Report comparing actual and target cost. A sample report was provided showing budget, actual and variance.			
7	ASSET MANAGEMENT INFORMATION SYSTEM		A		1
7.1	Adequate system documentation for users and IT operators.	<p>The Robe River asset management system utilises a combination of related Corporate Rio Tinto systems, data and processes, as per the Asset Management Improvement Plan.</p> <p>These systems include:</p> <ul style="list-style-type: none"> • RTTMS (Rio Tinto Ticketing Management System) – for recording customer contacts/complaints and creating work orders to investigate and rectify. The system is also used internally for creating actions to complete a work request, e.g. updating the information included in a work procedure. • SAP (maintenance planning system) - limited access, with separate codes for access to individual functions of the system. • HSEQ system - controlled document management system for HSEQ specific information, with limited access. • FDMS (document management system) - limited access based on position and with document check and approval functions. • Prospect - business management system (including incident reporting) - access by logon to PC. • CAPS - Capital Approvals & Planning System - approval for capital projects - access by logon to PC. • Iron Ore Intranet - various functions, including the portal for the Engineering & Asset Management group (custodians of the RTIO Asset Management standards). 			

Item no.	Component and Effectiveness Criteria (refer criteria in Audit Guidelines)	Observations and results (including any potential improvements)
		<ul style="list-style-type: none"> • ARM – Active Risk Manager - access by logon to PC.. • SCADA CITECT - water and wastewater operating and control system - limited access, controlled by password. • Outage database for recording interruptions and spills data from Prospect. • Reporting for Operating Licence Performance and Compliance reports compilation. <p>The systems are documented within the system itself and for key functions in detailed operating procedures.</p>
7.2	Input controls include appropriate verification and validation of data entered into the system.	Data accuracy is controlled by edit checks of data fields in the key system and checks by the Administrator when entering manually completed work order requests and updates – considered adequate.
7.3	Logical security access controls appear adequate, such as passwords.	Access to all systems have restricted user access and require passwords that are regularly changed.
7.4	Physical security access controls appear adequate.	<p>The physical access restrictions to the Administration office in Perth and the control centre at Pannawonica were confirmed during the field visits.</p> <p>All offsite assets (e.g. bores, pump stations, storage tanks, sewer pump stations, wastewater treatment plants) are located in secure, fenced and locked compounds. Access to systems via personal PC is controlled by passwords, which are required to be changed on a regular basis.</p>
7.5	Data backup procedures appear adequate and backups are tested.	Data is continually backed up to cloud storage each day via Accenture. There is also a physical back up of the key data systems used by Robe River. Backups are tested and data backup procedures are sound.
7.6	Key computations related to licensee performance reporting are materially accurate.	From review of source data for the performance reporting, the calculations are considered to be accurate.
7.7	Management reports appear adequate for the licensee to monitor licence obligations.	<p>Service level data from the annual drinking water quality reports and annual performance reports (sewer overflows and water mains bursts) is tracked and reviewed on an annual basis. This information is used in the development of the asset replacement strategy and the capital plans, and also in the ongoing review of maintenance plans.</p> <p>There is also an annual review of compliance with the licence obligations in the Water Compliance Reporting Manual. Internal monthly management reports are used to track progress on actions/work and to monitor actual expenditure against budgets.</p>
7.8	Adequate measures to protect asset management data from unauthorised access or theft by persons outside the organisation.	<p>Access to all systems have restricted user access and require passwords that are regularly changed.</p> <p>Data is continually backed up to cloud storage each day via Accenture. There is also a physical back up of the key data systems used by Robe River. Backups are tested and data backup procedures are sound.</p>

Item no.	Component and Effectiveness Criteria (refer criteria in Audit Guidelines)	Observations and results (including any potential improvements)		
8	RISK MANAGEMENT		A	1
8.1	Risk management policies and procedures exist and are being applied to minimise internal and external risks associated with the asset management system.	Risk management plans and risk assessments (e.g. RTIO-HSE-0065318) have been used to develop and prioritise key operational tasks relative to the water and wastewater supply systems. Health, safety environment and quality (HSEQ) is also a key focus, for which frameworks, systems, procedures and documentation are in place (e.g. MS001, WC2150, WP1260-06).		
8.2	Risks are documented in a risk register and treatment plans are actioned and monitored.	The risks are documented in a risk register using Active Risk Manager software, including water quality and service failures, and as Critical Control Points in the Drinking Water Quality Management Plan. Treatment plans are included in these Plans and actioned via the operating and maintenance procedures.		
8.3	The probability and consequences of asset failure are regularly assessed.	Risk assessment documents are prepared for water and wastewater with consequence descriptors and contingencies which may be maintenance, monitoring, use of backups or spares etc. The most recent update of these was April 2021.		
9	CONTINGENCY PLANNING		A	1
9.1	Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks.	<p>The RTIO-AM-0180730 Water & Wastewater Asset Risk Contingency Pannawonica Town shows the predicted likelihood, consequence and risk of various asset failures together with existing contingency plans (for possible failure events). The Plan is reviewed at least annually via desktop exercises.</p> <p>There are also site based contingency plans that include drinking water quality, water mains failure, storage tank failure, water pump station failure, chlorination system failure, sewer pump station failure and sewer main failure. The contingency plans outline the responses, actions and responsibilities associated with mitigating an incident or emergency. Key contacts are also listed in the contingency plans. Debrief protocols are also included.</p> <p>The Drinking Water Quality Management Plan also includes incident reporting and emergency response procedures, and is tested at least annually.</p> <p>In addition, contingency and emergency planning for asset operations have been completed and are documented (e.g. Bushfire Risk Management HSE-0136457, Cyclone Management HSE-0127586, Chlorine Management Plan and Unplanned Effluent Release Plans for Pannawonica).</p>		
10	FINANCIAL PLANNING		A	1
10.1	The financial plan states the financial objectives and strategies and actions to achieve the objectives.	An overview of Robe River's Financial Planning processes is included in the Asset Management Improvement Plan. Rio Tinto's Business Planning group are responsible for the overall financial planning process within the organisation. Financial plans are managed by Utilities leadership team (General Manager, Managers) assisted by Business and Operational Analysts		

Item no.	Component and Effectiveness Criteria (refer criteria in Audit Guidelines)	Observations and results (including any potential improvements)		
10.2	The financial plan identifies the source of funds for capital expenditure and recurrent costs.	<p>Robe River's budgeting is zero based budgeting, with cost drivers justified on the basis of providing safe, efficient and reliable water and wastewater systems for town and mine/port customers.</p> <p>The costs are borne through mining operations revenue and seen as part of the overall cost of operating a mining business. There are no charges for water services at Pannawonica.</p> <p>The capital expenditure for ongoing water and sewer mains upgrades is included in the capital budget for 2017 – 2022.</p>		
10.3	The financial plan provides projections of operating statements (profit and loss) and statement of financial position (balance sheets).	<p>The costs are borne through mining operations revenue and seen as part of the overall cost of operating a mining business. There are no charges for water services at Pannawonica.</p> <p>These costs are included in Robe River's annual budgeting process.</p>		
10.4	The financial plan provides firm predictions on income for the next five years and reasonable indicative predictions beyond this period.	<p>The costs are borne through mining operations revenue and seen as part of the overall cost of operating a mining business. There are no charges for water services at Pannawonica.</p>		
10.5	The financial plan provides for the operations and maintenance, administration and capital expenditure requirements of the services.	<p>The costs are borne through mining operations revenue and seen as part of the overall cost of operating a mining business. There are no charges for water services at Pannawonica.</p> <p>These costs are included in Robe River's annual budgeting process.</p>		
10.6	Significant variances in actual/budget income and expenses are identified and corrective action taken where necessary.	<p>Variances in actual to budget income and expenses are reported in the monthly Utilities Cost Report to Rio Tinto's Utilities management group and corrective action is taken as necessary.</p>		
11	CAPITAL EXPENDITURE PLANNING		A	1
11.1	There is a capital expenditure plan that covers issues to be addressed, actions proposed, responsibilities and dates.	<p>The Water and Waste Water 5 Year Capital Plan 2019-2024 includes capital projects, the Project Leader, project details, justification, timing, financial budget and status. Although this is a relatively short timeframe, it is based on the mining industry timeframes.</p> <p>The capital expenditure for ongoing water and sewer mains upgrades at Pannawonica is included in the capital budget for 2019 – 2024.</p>		
11.2	The plan provides reasons for capital expenditure and timing of expenditure.	<p>The Water and Waste Water 5 Year Capital Plan 2019-2024 includes capital projects, the Project Leader, project details, justification, timing, financial budget and status.</p>		
11.3	The capital expenditure plan is consistent with the asset life and	<p>The reviewer confirmed the Capital Plan is based on review of the condition of the assets and the estimated life of the assets as recorded in the Asset Register.</p>		

Item no.	Component and Effectiveness Criteria (refer criteria in Audit Guidelines)	Observations and results (including any potential improvements)			
	condition identified in the asset management plan.				
11.4	There is an adequate process to ensure that the capital expenditure plan is regularly updated and actioned.	<p>The Water and Waste Water 5 Year Capital Plan 2019-2024 is reviewed and updated during the year with the project status, and a full review and update annually. There were no significant replacements or additions of assets during the review period, only upgrades of assets at the end of their useful life. Review of the planned projects list for all Rio Tinto sites confirmed the Plan has evidence of being actioned.</p> <p>The capital expenditure planning process is considered adequate for the water and wastewater assets.</p>			
12	REVIEW OF ASSET MANAGEMENT SYSTEM		A		1
12.1	A review process is in place to ensure that the asset management plan and the asset management system described therein are kept current.	<p>The AMIP states that it and linked documents are to be reviewed annually – although the AMIP document revision history indicates more recently this review is every second year. The most recent update is dated March 2021.</p> <p>Appendix 7 of the AIMP identifies linked documents such as the MoU for Drinking Water Quality and the WWTP Licence. Some minor errors in the “Next Update” information were identified and shared with RTIO staff for update in the next AIMP.</p>			
12.2	Independent reviews (e.g. internal audit) are performed of the asset management system.	<p>Independent reviews of specific elements of the water and wastewater activities have been conducted during the review period as part of Rio Tinto’s HSEQ (Health, Safety, Environment and Quality) audits and Group Audit and Assurance activities. These audits are carried out by internal Rio Tinto auditors but staff who are external to the division.</p> <p>An independent review is also performed (by the ERA appointed auditors) every 24 months as required by the licence or longer period as specified by the ERA</p>			

4.7 Review Recommendations

Table of Current Review Asset System Deficiencies and Recommendations

A. Resolved during current review period			
Reference (no./year) Compliance rating	Asset System Deficiency (AMS Component/Effectiveness Criteria/Details)	Auditor's Recommendation	Management Action taken by end of review period
	Nil		

B. Unresolved during current review period			
Reference (no./year) Compliance rating	Asset System Deficiency (AMS Component/Effectiveness Criteria/Details)	Auditor's Recommendation	Management Action taken by end of audit period
	Nil		

5. Appendix A - Methodology

A1. Audit and Review Approach

Our approach to meeting the requirements for the operational audit and asset management system effectiveness review is set out below.

Audit and Review Planning

- Conduct an initial meeting with the ERA to confirm the audit/review approach and timing for the audit and review (*not required*).
- Contact the licensee to gain an understanding of the business, relevant management plans and systems that may affect the risk assessment for planning purposes (*completed*).
- Prepare a risk assessment including any specific factors or changes relevant to the licensee (in tabular form against each licence condition and asset management system component). (*completed*).
- **Previous recommendations** – Review the recommendations from the previous audit and review and the actions taken by the licensee to address the recommendations. The outcome of this review has been considered in setting the audit priority of the licence obligations. (*completed*).
- Submit a draft **Audit and Review Plan**, including the risk assessment and proposed approach, to the ERA for review and approval.
- Send a **Pre-Visit Checklist** of information and documentation to the licensee to enable staff to prepare for the visit (and where possible, send us information prior to the site visit).

Fieldwork

- Undertake a visit to the licensee and conduct various meetings with stakeholders, including corporate services and works/facilities management personnel, to determine the effectiveness of systems and procedures in place and to compare actual performance against the licence standards. **The on-site visit will include our Senior Engineer.**
- Review the status of the previous audit and review recommendations and confirm any corrective action. The audit will consider the recommendations and any action taken since the previous audit and review.
- Obtain copies of the latest asset management plans, performance reporting statistics and relevant correspondence between the licensee and the ERA for the audit period.
- The audit steps for the **Operational Audit** will include:
 - **analysis of documented procedures** to assess whether they are consistent with regulatory requirements or arrangements under the licence;
 - **review of systems and procedures** to assess whether they reflect compliance obligations and performance standards, including assessing and testing the following:
 - **control environment** – management’s philosophy and operating style, organisational structure, assignment of authority and responsibilities, the use of internal audit, the use of information technology and the skills and experience of the key staff members;
 - **information system** – the appropriateness of the information systems to record the information needed to comply with the licence, accuracy of data, security of data, cyber security and documentation describing the information system;

- **control procedures** – the presence of systems and procedures to monitor compliance with the licence or the effectiveness of the asset management system and to detect and correct non-compliance or under-performance;
 - **compliance attitude** - the action taken by the licensee in response to the previous audit/review recommendations, and an assessment of management’s attitude towards compliance; and
 - **outcome compliance** – the actual performance against standards prescribed in the licence throughout the audit period.
- Update the risk assessment with any new information obtained in the course of the audit testing and, in instances of significant non-compliance, assess the licensee’s plan to ensure compliance and recommend any further improvements to achieve compliance.
- The activities in the **Asset Management System Review** will include:
 - analyse the documented procedures and processes for the planning, construction, operation and maintenance of assets to assess whether they are consistent with regulatory requirements under the licence;
 - interview key personnel to assess whether they understand and comply with the documented processes and procedures;
 - physically inspect the key assets and infrastructure; and
 - assess the effectiveness of the processes and system in place.

Audit and Review Reporting

- Prior to the conclusion of the visit, the lead auditor will discuss any observations and recommendations with the licensee’s management to confirm our understanding of the issues and to discuss the action to be taken.
- Provide a draft report to the ERA for review no later than two weeks before the final report is due and make any revisions necessary.
- Provide the updated draft report to the ERA for review and feedback prior to finalising the report.
- Issue the final report to the ERA.
- The ERA will arrange responses to the proposed actions in the Post Audit Implementation Plan.

A2. Key Documents Reviewed

Regulatory Documents and Reports

- Water Services Act 2012
- Water Services Code of Conduct (Customer Service Standards) 2018
- Water Services Code of Practice (Family Violence) 2020
- Water Services Regulations 2013
- 2019 Audit and Review Guidelines: Water Licences
- Water Compliance Reporting Manual – 2021, 2020, 2018 and 2017.
- Water Services Operating WL45 – Version 2 (From 1 July 2016 to 30 April 2020); and Version 3 (From 1 May 2020 and onwards; changes from the ERA’s 2019 Water Licence Review).
- Map of Licence Operating Area OWR-OA-308
- 2017 Audit and Review Report – WL45 (7 September 2017)
- Compliance reports to ERA for 2016/17, 2017/18, 2018/19 and 2019/20 (and evidence of receipt by ERA).
- Performance reports to ERA for 2016/17, 2017/18, 2018/19 and 2019/20 (and evidence of receipt by ERA).

- Performance reporting datasheets for 2016/17, 2017/18, 2018/19 and 2019/20
- Water, Sewerage and Irrigation Licence Performance Reporting Handbook – May 2019.
- S. 5C Rights in Water and Irrigation Act 1914 (WA) Groundwater Well Licence (GWL 107677)
- Memorandum of Understanding ('MOU') between Department of Health ('DOH') and Robe River Mining Company Pty Ltd for Drinking Water dated 31 January 2020
- Energy & Water Ombudsman membership;
- Department of Water and Environmental Regulation - WWTP Licence (L7455 Pannawonica Town)
- Relevant correspondence between the Licensee and the ERA, Department of Environment and Department of Health (as applicable).

Operational Audit

- Relevant correspondence between the Licensee and the ERA
- LAORS Approval / Agreement and Legislative Requirements Register.
- Compliance Calendar from 1 May 2017 to 30 April 2021
- Core Services – SWP Water Services Act 2012 requirements – Working at premises and in roads procedure
- Core Services – SWP Water Services Act 2012 requirements – Major and general works procedure
- Pilbara Utilities – Pipe Break – Return of Potable Water Mains to Service (Drinking Water Quality) Standard Work Procedure ('SWP')
- Utilities Division – Sewer Overflow SWP
- "Keeping your distance – a guide for undertaking works near our water infrastructure
- Water Service Interruptions Guideline.
- Compliance Officers (Water) - internal guidelines procedure
- Compliance Officers (Water) Notices Register
- Compliance Officers - Certificates of Designation
- RT-Pilbara-Pannawonica Welcome Pack
- Financial Hardship and Payment Difficulty Policy
- Utilities Division – Complaint Dispute Resolution Policy and form (available publicly)
- Core Services Customer Complaints Resolution Guideline
- Robe River Customer Complaints Reporting Register and complaint records for the period from 1 May 2017 to 30 April 2021
- Utilities Division – Life Support Register procedure.
- Utilities Division – Life Support Register
- Utilities Division - Invoicing and metering procedure
- Robe River Mining Pty Ltd – Financial Reports for 2016/17, 2017/18, 2018/19 and 2019/20
- Utilities Compliance Schedule
- Statutory Reporting and Guidance Register
- Pilbara Utilities – Annual water services reporting
- Correspondence between Robe River and the Energy and Water Ombudsman (WA)
- Residential water or electricity account application
- Standard connections for water, sewerage and electricity supply procedure
- Annual Reports to DOH for 2016/17, 2017/18, 2018/19 and 2019/20
- Family violence guidance for residential water services customers

Asset Management System Review

- RTIO-AM-0099745 Asset Management Improvement Plan – Water and Wastewater Services 2021
- Guidance Note (GN)'GN-A029 Asset Management Tactics Development and Management
- Robe River – Drinking Water Quality Plan (Latest version)

- RTIO-AM-0180730 Water & Wastewater Asset Risk Contingency Pannawonica Town
- RIO-AM-0170583 Asset Strategy for Ageing W & WW Towns
- Blue Sheet and the Capital Expenditure Approval (example)
- GN-A016 Operational Readiness
- RTIO Utilities Small Project - OR Checklist
- Capital Accounting Manual.
- Engineering and Asset Management Intranet page – Materials Management – Asset Disposals.
- GN-A029 Asset Management Tactics Development and Management
- Water Quality Reports (sample of annual, quarterly and monthly reports)
- Water and Wastewater Site Reliability Plans and Operational Procedures
- RTIO-AM-0180727 Site Reliability Plan Pannawonica WWTP.
- RTIO-HSE-0018427 WWTP Operations and Maintenance Guide
- Standard Work Procedures (sample)
- Asset Register (example)
- Utilities Cost Report (example)
- Operations and Maintenance dashboard
- RTIO-AM-0167148 Water Infrastructure Maintenance Standard Specification
- RTIO-AM-0108336 SAP Maintenance Plans
- RCM Water Maintenance Tactics Library document
- RTIO-AM-0180730 Water & Wastewater Asset Risk Contingency Pannawonica Town
- HSE-0136457 Bushfire Risk Management
- HSE-0127586 Cyclone Management
- Chlorine Management Plan for Pannawonica
- Unplanned Effluent Release Plans for Pannawonica..

A3. Key Contacts

The licensee’s representatives participating in the audit were:

- Tegan Campbell, Specialist Regulatory Compliance, Utilities Operations
- Andrew Pezzali, Superintendent Utilities Robe Valley
- Darrell King, Supervisor Statutory Compliance Robe Valley
- Tony Collier, Principal Advisor Hydrocarbons, Water and Wastewater
- Neil Kearny, Engineer
- Darren Brandli, Specialist Water Operations (water quality)
- Jimmy Taneski, Specialist Customer Services
- Claire Njelesani-Njovu, Specialist Commercial
- Bethany Challen, Environmental Superintendent/Advisor.

A4. Consultants

NAME AND POSITION	BUDGET HOURS
Geoff White - Director	15
Geoff Hughes – Principal Planning Engineer	30
Susan Smith - Manager	30
TOTAL	75

END OF REPORT