LEAD ASSET MANAGEMENT

Suite 3, Level 11, 111 St Georges Tce, Perth, WA 6000
www.leadassetmanagement.com.au
ABN: 17 657 211 562
ACN: 657 211 562

Harvey Water

Water Services Licence (WL31)
2026 Operational Audit

Final report

August 2026

Suite 3, Level 11, 111 St Georges Tce, Perth, WA 6000
www.leadassetmanagement.com.au
ABN: 17 657 211 562
ACN: 657 211 562

3 August 2026

Alison Ovenden
Senior Regulatory Officer
Economic Regulation Authority
Level 4, Albert Facey House
469 Wellington Street
PERTH WA 6000

Dear Alison

Water Service Licence (WL31) – 2026 Operational audit report

We have completed the Water Services Licence Operational Audit for Harvey Water for the period 1 December 2022 to 30 November 2025 and are pleased to submit our report to you.

I confirm that this report is an accurate presentation of the findings and conclusions from our review procedures.

If you have any questions or wish to discuss anything raised in the report, please contact Joey Fu at joey@leadassetmanagement.com.au or myself at daniel@leadassetmanagement.com.au.

Yours sincerely,

Lead Asset Management

[redacted]

Daniel Rivera
Managing Director
www.leadassetmanagement.com.au

1. Table of Contents

1. Table of Contents 3
1. Independent auditor's assurance report 4
2. Executive Summary 6
2.1 Introduction and Background 6
2.2 Observations 6
2.3 Findings 6
2.4 Harvey Water's response to previous audit recommendations 7
2.5 Current audit non-compliances, recommendations and action plans 8
3. Scope of works 9
3.1 Scope and objectives 9
3.2 Approach and work schedule 9
4. Summary of Ratings 11
5. Detailed findings, recommendations and action plans 22
6. Status of recommendations addressing non-compliances from the previous audit 70
Appendix A – Audit Plan 72
Appendix B – References 73

1. Independent auditor's assurance report

Modified opinion

We have undertaken a reasonable assurance engagement on Harvey Water's (Harvey Water) compliance, in all material respects, with the conditions of its Water Services Licence (WL 31) (the Licence) and relevant legislative obligations for the period 1 December 2022 to 30 November 2025. Our evaluation was made against the licence obligations listed in the relevant versions of the Economic Regulation Authority's (the ERA) Water Compliance Reporting Manual (the Reporting Manual) and in accordance with the ERA's Audit and Review Guidelines for Water Licences (Audit Guidelines).

In our opinion, based on the procedures we have performed and the evidence we have obtained, except for the effects of the matters described in the Basis for modified opinion paragraph below, Harvey Water has complied, in all material respects, with its licence conditions and relevant legislative obligations for the period 1 December 2022 to 30 November 2025.

Basis for modified opinion

During the period 1 December 2022 to 30 November 2025, Harvey Water did not comply with applicable licence obligations as outlined below. The non-compliance is summarised in the table below and is described in full at Section 4 of this report (recommendation 01/2026).

Reporting Manual number and Licence obligation	Description
144E (2018 & 2024) *Clause 48, Licence Condition 4.1.1* The licensee must provide a 24-hour information line at local call cost for supply interruption information.	Harvey Water did not provide a 24-hour information line at local call cost for customers to obtain information about supply interruptions.

We conducted our engagement in accordance with Standard on Assurance Engagements ASAE 3100 Compliance Engagements (ASAE 3100) issued by the Auditing and Assurance Standards Board.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Harvey Water's responsibility for compliance with the conditions of the Licence

Harvey Water is responsible for:

- Compliance with the Licence as evaluated against the conditions within the Licence, for the period 1 December 2022 to 30 November 2025
- Identifying risks that threaten the conditions within the Licence identified above being met
- Identifying suitable compliance requirements as specified by the ERA
- Identifying, designing and implementing controls to enable the conditions within the Licence to be met and to monitor ongoing compliance.

Our independence and quality control

We have complied with the independence and other relevant ethical requirements relating to assurance engagements, which are founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour. We applied Auditing Standard ASQC 1 Quality Control for Firms that Perform Audits and Reviews of Financial Reports and Other Financial Information, and Other Assurance Engagements in undertaking this assurance engagement.

Our responsibilities

Our responsibility is to express an opinion on Harvey Water's compliance, in all material respects, with the licence obligations as evaluated against its Licence Conditions for the period 1 December 2022 to 30 November 2025. ASAE 3100 requires that we plan and perform our procedures to obtain reasonable assurance about whether Harvey Water has complied, in all material respects, with the licence obligations as evaluated against its Licence Conditions for the period from 1 December 2022 to 30 November 2025.

A reasonable assurance engagement in accordance with ASAE 3100, to report on Harvey Water's compliance with the licence obligations as evaluated against its Licence Conditions involves performing procedures to obtain evidence about the compliance activity and controls implemented to meet the conditions within the Licence. The procedures selected depend on our judgement, including the identification and assessment of risks of material non-compliance with the licence obligations as evaluated against its Licence Conditions.

Our procedures included:

- Utilising the Audit Guidelines and the versions of the Water Compliance Reporting Manuals relevant to the audit period as a guide for development of a risk assessment and document review to assess controls
- Development of an Audit Plan for approval by the ERA and an associated work program, set out in Appendix A
- Interviews with and representations from relevant Harvey Water representatives to gain an understanding of process controls
- Review of documents and walkthrough of processes and controls to support the assessment of compliance and the effectiveness of the control environment in accordance with Licence obligations
- Sample testing where relevant for obligations rated as an audit priority 3 and above in the approved Audit Plan.

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 compliance requirements may occur and not be detected.

A reasonable assurance engagement relating to the period from 1 December 2022 to 30 November 2025 does not provide assurance on whether compliance with the Licence will continue in the future.

Restricted use

This report has been prepared for use by the intended users as specified in Section 25 of the Water Services Act 2012 for the purpose of expressing an opinion on Harvey Water's compliance, in all material respects, with the licence obligations as evaluated against its Licence Conditions for the period 1 December 2022 to 30 November 2025. We disclaim any assumption of responsibility for any reliance on this report to any person other than the intended users as specified in Section 25 of the Water Services Act 2012, or for any purpose other than that for which it was prepared.

Lead Asset Management



Joey Fu

Lead Auditor- Operational Audit

3 August 2026

2. Executive Summary

2.1 Introduction and Background

The Economic Regulation Authority (the **ERA**) has under the provisions of the Water Services Act 2012 (the **Act**), issued to Harvey Water (the **Licence**) a Water Services Licence (WL31). Harvey Water is a water services licensee providing non-potable irrigation water services in the Harvey region of Western Australia.

The Licence relates to Harvey Water providing non-potable water supply and irrigation services in the Southwest region of Western Australia. Harvey Water operates channel and piped irrigation delivery systems serving approximately 1,000 irrigators across the Harvey, Waroona and Collie areas. In addition, Harvey Water provides potable (drinking-quality) water to one industrial customer, Albemarle Lithium, under an Industrial Water Supply Agreement (IWSA) covering the Albemarle Kemerton lithium hydroxide plant.

Section 25 of the Act requires Harvey Water to provide to the ERA an operational audit (the audit) conducted by an independent expert acceptable to the ERA within 24 months after the commencement date, and every 24 months thereafter, unless otherwise approved by the ERA. With the ERA's approval, Lead Asset Management has been appointed to conduct the audit for the period 1 December 2022 to 30 November 2025 (**audit period**).

The audit has been conducted in accordance with the ERA's 2025 Audit and Review Guidelines for Water Licences (Audit Guidelines), to assess Harvey Water's compliance with the conditions of its licence.

2.2 Observations

In considering Harvey Water's internal control procedures, structure and environment, its compliance culture and its information systems specifically relevant to those licence obligations subject to audit, we observed that:

- Harvey Water demonstrated a working understanding and a high level of compliance with its licence obligations throughout the audit period, with the exception of the non-compliance noted below.
- The non-compliance identified relates to the requirement under Clauses 45 (2018 Code) and 48 (2024 Code) of the Water Services Code of Conduct (Customer Service Standards) for Harvey Water to provide a 24-hour information line at the cost of a local telephone call.
- Harvey Water maintains documented procedures and policies for its water service operations, including the Procedure Manual 2025 and Customer Service Charters.
- Control environment — Harvey Water has established and maintained an adequate control environment, including documented operational policies and procedures, an asset management framework aligned with ISO 55001 principles, defined organisational roles and responsibilities, training matrices for operational staff, and an independent internal audit function (PKF Integrity Services) if required.
- Integrity of reporting — We assessed the completeness and accuracy of Harvey Water's annual compliance and performance reports submitted to the ERA for the periods 2022-23, 2023-24 and 2024-25, and its quarterly reports to the Department of Health for the potable water supply scheme. We have no matters to report on the integrity of Harvey Water's reporting to the ERA and other statutory organisations.

2.3 Findings

The following tables summarise the assessments made during the audit on Harvey Water's compliance and the adequacy of controls in place for Harvey Water to manage its compliance with the relevant obligations or conditions of the Licence.

Table 1 sets out the rating scale defined by the ERA in the Audit Guidelines for the assessment of the level of compliance with the conditions of the Licence. For the highest possible compliance rating to be achieved, Harvey Water was required to demonstrate it has maintained mature processes and controls, which facilitate compliance with relevant obligations.

Table 1: Control adequacy and compliance rating scale

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
N/P	Not performed – A controls rating was not required	**N/R**	Not rated – No activity took place during the audit period

Table 3 at section 4 of this report provides further detail on the controls and compliance rating scales. The above rating scale is defined by the Audit Guidelines.

Table 2: Summary of findings, by compliance and controls ratings

		Compliance rating					
		1	**2**	**3**	**4**	**N/R**	**Total**
Controls rating	**A**	-	-	-	-	-	**0**
	B	-	-	-	-	-	**0**
	C	-	**1**	-	-	-	**1**
	D	-	-	-	-	-	**0**
	N/P	**81**	-	-	-	**102**	**183**
Total		**81**	**1**	**0**	**0**	**102**	**184**

Note that, in accordance with the Audit Guidelines:

- Obligations assessed as being “not applicable” to Harvey Water’s operations have not been included within this report
- A control rating is only provided for those obligations with a Priority 1, 2 or 3 rating, where an obligation is assessed as non-compliant, or where a control improvement opportunity is identified.

2.4 Harvey Water’s response to previous audit recommendations

The 2022 operational audit (covering the period 1 December 2019 to 30 November 2022, reported by the ERA on 23 November 2023) identified one minor non-compliance and no controls deficiencies across the 216 applicable licence obligations. The non-compliance related to Section 210(5) of the Water Services Act 2012 — Harvey Water's procedure manual did not reference the designation of an inspector or compliance officer. As Harvey Water has not appointed (and is not required to appoint) an inspector or compliance officer, the ERA considered this a minor non-compliance.

Refer to Section 6 of this report for the auditor's assessment of the status of the previous audit recommendation.

2.5 Current audit non-compliances, recommendations and action plans

A. Resolved during current audit period

Nil.

B. Unresolved at end of current audit period

Reference (no./year)	Non-compliance / Controls improvement	Auditor's recommendation	Action taken
01/2026	**C/2** **Obligation 144E (2018 & 2024) – Clause 48** **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 obtain information about the reason for, and the expected duration of, any unplanned service interruption. Harvey Water's only after-hours emergency contact is mobile 0439 192 324, which does not satisfy the local-call-cost requirement of Clause 48.**	Harvey Water should establish a 24-hour information line at the cost of a local telephone call (e.g. a 1300 or landline number), as required under Clauses 45 (2018 Code) and 48 (2024 Code) of the Water Services Code of Conduct (Customer Service Standards). The number should be published on Harvey Water's website, customer service charters and invoice templates.	Harvey Water are currently available 24/7 on a mobile service for our 1 potable industrial customer. Due to a change in circumstances, this customer will no longer require our services in the near future. As such, the cost of establishing a 24/7 information line at this stage is not considered a viable option.

3. Scope of works

3.1 Scope and objectives

We have conducted a reasonable assurance audit in order to state whether, in our opinion, based on our procedures, Harvey Water has complied, in all material respects, with the conditions of its Licence as outlined in the approved Audit Plan during the period 1 December 2022 to 30 November 2025.

Our engagement was conducted in accordance with Australian Standard on Assurance Engagements ASAE 3100 Compliance Engagements, issued by the Australian Auditing and Assurance Standards Board and provides reasonable assurance as defined in ASAE 3100. The procedures we performed are described in more detail in section 3.2 below.

A reasonable assurance engagement in accordance with ASAE 3100 involves performing procedures to obtain evidence about the compliance activity and controls implemented to meet the conditions of the Licence. The nature, timing and extent of procedures selected depend on the assurance practitioner's professional judgement, including the assessment of the risks of material misstatement in compliance with the conditions of the Licence. In making those risk assessments, we considered internal controls in relation to compliance with the conditions of the Licence.

ASAE 3100 also requires us to comply with the relevant ethical requirements of the Australian professional accounting bodies.

The ERA has summarised the requirements of the applicable legislation that it expects to be reported upon and included in the scope of this audit in its Water Compliance Reporting Manual.

The Audit Plan approved by the ERA for this audit sets out Harvey Water's Licence obligations confirmed to be included in the scope of the audit, along with the risk assessments and audit priority assigned to each licence obligation.

3.2 Approach and work schedule

Our approach for this audit involved the following activities, undertaken during the period February to March 2026 by audit team members Joey Fu (Lead Auditor – Operational Audit) and Daniel Rivera (Lead Auditor – Asset Management System Review). Refer to Appendix B for the licensee personnel interviewed and key documents reviewed.

- Utilising the Guidelines and Reporting Manuals as a guide, developed a risk assessment, which involved discussions with key staff and document review to assess controls
- Consideration of the compliance results reported in the 2022, 2023 and 2024 Annual compliance reports submitted by Harvey Water to the ERA
- Developed an Audit Plan (see Appendix A) for approval by the ERA, and an associated work program
- Obtained information and explanations from relevant Harvey Water representatives to gain an understanding of process controls (see Appendix B for staff involved)
- Reviewed relevant documentation and walked through processes and controls to assess overall compliance and effectiveness in accordance with Licence obligations (see Appendix B for reference listing)
- Tested relevant obligations and where there was relevant activity, determined whether transactions complied with the requirements of the obligation
- Obtained representations from Harvey Water staff regarding:
    - The existence or relevance of activity subject to compliance obligations throughout the audit period
    - Compliance with obligations where 100% testing was not performed
- Validated findings with Harvey Water staff.

The majority of audit fieldwork was performed remotely (via email exchange and Microsoft Teams calls).

Sampling basis — Albemarle Lithium is Harvey Water's only potable industrial customer and the only source of bills issued under the Water Services Code of Conduct (Customer Service Standards). The population of bills issued during the audit period was 37 invoices. Given the small finite population, we sighted 100% of issued invoices (WP-ALB-BILL-01) for the obligations relating to billing (Clauses 10–18 of the 2024 Code, Reporting Manual obligations 94–112C). For other obligations, walk-through and document inspection were used as described in the procedures above; the Audit Plan classified all obligations as Priority 4 and the 2025 Audit and Review Guidelines do not require statistical sampling at that priority.

Site visits — A site visit was conducted to Harvey Water's offices and operational facilities including the Stirling Dam, channel and pipe distribution network, and Albemarle potable water supply infrastructure. Inspections were undertaken to validate operational practices and asset condition.

Compliance and performance reports reviewed — Annual Compliance Reports for 2022-23, 2023-24 and 2024-25 submitted by Harvey Water to the ERA, and the corresponding Annual Performance Reports prepared in accordance with the Water Services Operating Licence Performance Reporting Handbook.

Deviations from the approved Audit Plan — There were no deviations from the audit plan approved by the ERA. The scope, methodology, audit team, timing and procedures performed were consistent with the approved Audit and Review Plan.

4. Summary of Ratings

Table 1 in section 2 above sets out the rating scale defined by the ERA in the Audit Guidelines for the assessment of the level of compliance with the conditions of the Licence. For the highest possible compliance rating to be achieved, Harvey Water was required to demonstrate it has maintained effective processes and controls, which facilitate compliance with relevant obligations.

The remainder of this report provides:

- A summary of the findings for the compliance obligations (at Table 3 below)
- Detailed findings, including relevant observations and recommendations (at Section 5).

Table 3: Compliance Ratings

Refer to Detailed Findings at Section 5 and Audit Plan at Appendix A for descriptions of the obligations. Note that detailed findings are not presented for those obligations assessed to be not applicable to Harvey Water's operations for the period subject to audit - refer to the Audit Plan at Appendix A for further explanation.

No	Obligation reference	Audit Priority	Controls rating					Compliance rating				
			A	B	C	D	N/P	1	2	3	4	N/R
Water Services Act 2012												
2	Sec 21(1)(b)	**Priority 4**					**N/P**					**N/R**
3	Sec 21(1)(c)	**Priority 4**					**N/P**	**1**				
4	Sec 22	**Priority 4**					**N/P**					**N/R**
5	Sec 23	**Priority 4**					**N/P**	**1**				
6 (2018 & 2024)	Sections 24(1)(a)	**Priority 4**					**N/P**	**1**				
8 (2018)	Section 24(1)(c)	**Priority 4**					**N/P**	**1**				
8A (2024)	Section 24(2)	**Priority 4**					**N/P**	**1**				
9	Section 25	**Priority 4**					**N/P**	1				
10	Section 26(3)	**Priority 4**					**N/P**					**N/R**
13	Section 36	**Priority 4**					**N/P**	**1**				
14	Section 60	**Priority 4**					**N/P**					**N/R**
15	Section 70(2)	**Priority 4**					**N/P**	**1**				
16	Section 77(3)	**Priority 4**					**N/P**	**1**				
17	Sections 82(4) & (5)	**Priority 4**					**N/P**					**N/R**

No	Obligation reference	Audit Priority	Controls rating					Compliance rating				
			A	B	C	D	N/P	1	2	3	4	N/R
18	Section 84(2)	**Priority 4**					**N/P**					**N/R**
19	Section 87(2)	**Priority 4**					**N/P**					**N/R**
20	Section 90(7)	**Priority 4**					**N/P**	**1**				
22	Section 96(1)	**Priority 4**					**N/P**					**N/R**
23	Section 96(5)	**Priority 4**					**N/P**					**N/R**
28	Sec 119(2)	**Priority 4**					**N/P**					**N/R**
29	Sec 122(2)	**Priority 4**					**N/P**					**N/R**
30	Sec 125(2)	**Priority 4**					**N/P**					**N/R**
31	Sec 128(4)	**Priority 4**					**N/P**	**1**				
32	Sec 129(5)	**Priority 4**					**N/P**	**1**				
33	Sec 139(3)	**Priority 4**					**N/P**					**N/R**
34	Sec 141(1)	**Priority 4**					**N/P**	**1**				
35	Sec 142	**Priority 4**					**N/P**					**N/R**
36	Sec 143(2)	**Priority 4**					**N/P**					**N/R**
37	Sec 143(3)	**Priority 4**					**N/P**					**N/R**
38	Sec 144(3)	**Priority 4**					**N/P**					**N/R**
39	Sec 145(2)	**Priority 4**					**N/P**					**N/R**
40	Sec 147(3)	**Priority 4**					**N/P**					**N/R**
41	Sec 147(4)	**Priority 4**					**N/P**					**N/R**

No	Obligation reference	Audit Priority	Controls rating					Compliance rating				
			A	B	C	D	N/P	1	2	3	4	N/R
42	Sec 151(1)	**Priority 4**					**N/P**					**N/R**
43	Sec 151(2)	**Priority 4**					**N/P**					**N/R**
44	Sec 152(3)	**Priority 4**					**N/P**					**N/R**
45	Sec 153(3)	**Priority 4**					**N/P**					**N/R**
45A (2024)	Section 160(1)	**Priority 4**					**N/P**					**N/R**
46	Section 166(5)	**Priority 4**					**N/P**					**N/R**
47	Section 166(6)	**Priority 4**					**N/P**					**N/R**
48	Section 170	**Priority 4**					**N/P**					**N/R**
49	Section 173(4)	**Priority 4**					**N/P**	**1**				
50	Section 174(1)	**Priority 4**					**N/P**	**1**				
51	Section 174(3)	**Priority 4**					**N/P**	**1**				
52	Section 175(2)	**Priority 4**					**N/P**					**N/R**
53	Section 175(5)	**Priority 4**					**N/P**					**N/R**
54	Section 176(1)	**Priority 4**					**N/P**					**N/R**
55	Section 176(3)	**Priority 4**					**N/P**	**1**				
56	Section 176(4)	**Priority 4**					**N/P**					**N/R**
57	Section 181	**Priority 4**					**N/P**					**N/R**
58	Section 186	**Priority 4**					**N/P**					**N/R**
59	Sections 187(1) - (3)	**Priority 4**					**N/P**					**N/R**

No	Obligation reference	Audit Priority	Controls rating					Compliance rating				
			A	B	C	D	N/P	1	2	3	4	N/R
60	Section 190(4)	**Priority 4**					**N/P**					**N/R**
61	Section 190(5)	**Priority 4**					**N/P**					**N/R**
62	Section 210(5)	**Priority 4**					**N/P**					**N/R**
63	Section 218(2)	**Priority 4**					**N/P**	**1**				
64	Section 218(3)	**Priority 4**					**N/P**	**1**				
Water Services Regulations 2013												
66	Reg 24(4)	**Priority 4**					**N/P**					**N/R**
67	Reg 26(3)	**Priority 4**					**N/P**					**N/R**
68	Reg 26(5)	**Priority 4**					**N/P**					**N/R**
69	Reg 29(1)	**Priority 4**					**N/P**					**N/R**
70	Reg 42(2)	**Priority 4**					**N/P**					**N/R**
71	Reg 43(3)	**Priority 4**					**N/P**					**N/R**
72	Reg 43(6)	**Priority 4**					**N/P**					**N/R**
74	Regulation 60(2)	**Priority 4**					**N/P**					**N/R**
75	Regulation 63	**Priority 4**					**N/P**	**1**				
89	Regulation 65	**Priority 4**					**N/P**					**N/R**
Water Services Code of Conduct (Customer Service Standards) 2018 &2024												
92	Clause 8(1)-(3)	**Priority 4**					**N/P**					**N/R**
93	Clause 9(2) and (4)	**Priority 4**					**N/P**					**N/R**
94	Clause 10(2)	**Priority 4**					**N/P**					**N/R**

No	Obligation reference	Audit Priority	Controls rating					Compliance rating				
			A	B	C	D	N/P	1	2	3	4	N/R
95	Clause 11(2)	**Priority 4**					**N/P**	**1**				
96	Clause 11(3)	**Priority 4**					**N/P**	**1**				
97	Clause 11(4)	**Priority 4**					**N/P**					**N/R**
98	Clause 11(5)	**Priority 4**					**N/P**					**N/R**
98A	Clause 11(6)	**Priority 4**					**N/P**	**1**				
99 (2018 & 2024)	Clause 12(3)	**Priority 4**					**N/P**	**1**				
99A	Clause 12(1)	**Priority 4**					**N/P**	**1**				
99B	Clause 12(2)	**Priority 4**					**N/P**	**1**				
99C	Clause 12(4)	**Priority 4**					**N/P**	**1**				
99D	Clause 12(5)	**Priority 4**					**N/P**	**1**				
100	Clause 13(2)	**Priority 4**					N/P	1				
100A (2018 & 2024)	Clause 13(7)	**Priority 4**					**N/P**					**N/R**
101 (2018 & 2024)	Clause 13(3)	**Priority 4**					N/P	1				
101A (2018 & 2024)	Clause 13(4)	**Priority 4**					**N/P**					**N/R**
102A (2018 & 2024)	Clause 13(5)	**Priority 4**					N/P	1				
103	Clause 14(1)	**Priority 4**					**N/P**					**N/R**
104	Clause 14(2)	**Priority 4**					**N/P**					**N/R**
104A	Clause 15(3)	**Priority 4**					**N/P**					**N/R**

No	Obligation reference	Audit Priority	Controls rating					Compliance rating				
			A	B	C	D	N/P	1	2	3	4	N/R
105	Clause 16(1)	**Priority 4**					**N/P**					**N/R**
106	Clause 17(2) and (3)	**Priority 4**					**N/P**	**1**				
107	Clause 18(2)	**Priority 4**					**N/P**	**1**				
108	Clause 18(3)	**Priority 4**					**N/P**					**N/R**
109	Clause 18(4)	**Priority 4**					**N/P**	**1**				
110	Clause 18(5)	**Priority 4**					**N/P**					**N/R**
111A	Clause 19(2)	**Priority 4**					**N/P**	**1**				
112A	Clause 19(3)	**Priority 4**					**N/P**	**1**				
112B	Clause 19(4)	**Priority 4**					**N/P**					**N/R**
112C	Clause 19(5)	**Priority 4**					**N/P**	**1**				
113	Clause 21(1)	**Priority 4**					**N/P**	**1**				
113A (2024)	Clause 21(2)	**Priority 4**					**N/P**					**N/R**
113B (2024)	Clause 21(3)	**Priority 4**					**N/P**					**N/R**
114 (2018 & 2024)	Clause 22(1)	**Priority 4**					**N/P**	**1**				
115 (2018 & 2024)	Clauses 22(2) & (4)	**Priority 4**					**N/P**	**1**				
116 (2018 & 2024)	Clause 22(3)	**Priority 4**					**N/P**	**1**				
117 (2018)	Clause 20(5), to July 2024	**Priority 4**					**N/P**	**1**				
117A (2018 & 2024)	Clause 20(1)	**Priority 4**					**N/P**	**1**				

No	Obligation reference	Audit Priority	Controls rating					Compliance rating				
			A	B	C	D	N/P	1	2	3	4	N/R
118 (2018 & 2024)	Clause 24	**Priority 4**					**N/P**	**1**				
119 (2018 & 2024)	Clause 25(1)	**Priority 4**					**N/P**	**1**				
120 (2018 & 2024)	Clause 25(2)	**Priority 4**					**N/P**	**1**				
121 (2018 & 2024)	Clause 26	**Priority 4**					**N/P**					**N/R**
122 (2018 & 2024)	Clause 27(1)	**Priority 4**					**N/P**					**N/R**
123 (2018 & 2024)	Clause 28	**Priority 4**					**N/P**					**N/R**
123A (2024)	Clause 29(1)-(2)	**Priority 4**					**N/P**					**N/R**
124A (2018)	Clause 28(2) to July 2024	**Priority 4**					**N/P**					**N/R**
124B (2018 & 2024)	Clause 30(1)	**Priority 4**					**N/P**					**N/R**
124C (2018)	Clause 28(4) to July 2024	**Priority 4**					**N/P**					**N/R**
124D (2024)	Clause 30(4)	**Priority 4**					**N/P**					**N/R**
124F (2024)	Clause 30(7)	**Priority 4**					**N/P**					**N/R**
124G (2024)	Clause 31(1)	**Priority 4**					**N/P**					**N/R**
124H (2024)	Clause 31(2)	**Priority 4**					**N/P**					**N/R**
124I (2024)	Clause 31(3)	**Priority 4**					**N/P**					**N/R**
124J (2024)	Clause 31(4) and (5)	**Priority 4**					**N/P**					**N/R**
133 (2018 & 2024)	Clauses 34(4) and (5)	**Priority 4**					**N/P**	**1**				

No	Obligation reference	Audit Priority	Controls rating					Compliance rating				
			A	B	C	D	N/P	1	2	3	4	N/R
133A (2018 & 2024)	Clause 35	**Priority 4**					**N/P**	**1**				
134 (2018 & 2024)	Clause 36(1)(a)-(c)	**Priority 4**					**N/P**					**N/R**
134A (2018 & 2024)	Clause 36(1)(d)-(e)	**Priority 4**					**N/P**					**N/R**
135 (2018 & 2024)	Clause 43(1)	**Priority 4**					**N/P**					**N/R**
136 (2018 & 2024)	Clause 43(2)	**Priority 4**					**N/P**					N/R
137A (2018 & 2024)	Clause 39(1)	**Priority 4**					**N/P**					**N/R**
137B (2018 & 2024)	Clause 39(2)	**Priority 4**					**N/P**					**N/R**
137C (2018 & 2024)	Clause 39(3)	**Priority 4**					**N/P**					**N/R**
138 (2018 & 2024)	Clause 40(1)(a) and (c)-(d)	**Priority 4**					**N/P**					**N/R**
138A (2018)	Clause 37(1)(f)(g) to July 2024	**Priority 4**					**N/P**					**N/R**
138B (2018 & 2024)	Clause 41	**Priority 4**					**N/P**					N/R
139 (2018 & 2024)	Clause 42	**Priority 4**					**N/P**					**N/R**
142 (2018 & 2024)	Clause 44(5)	**Priority 4**					**N/P**					**N/R**
144 (2018 & 2024)	Clause 44(6)	**Priority 4**					**N/P**					**N/R**
144A (2018 & 2024)	Clause 46(1)	**Priority 4**					**N/P**					**N/R**

No	Obligation reference	Audit Priority	Controls rating					Compliance rating				
			A	B	C	D	N/P	1	2	3	4	N/R
144B (2018 & 2024)	Clause 46(2)	**Priority 4**					**N/P**					**N/R**
144C (2018 & 2024)	Clause 47(1)	**Priority 4**					**N/P**	**1**				
144D (2018 & 2024)	Clause 47(2)	**Priority 4**					**N/P**	**1**				
144E (2018 & 2024)	Clause 48	**Priority 4**			**C**				**1**			
145 (2018 & 2024)	Clause 49(1)	**Priority 4**					**N/P**	**1**				
146 (2018 & 2024)	Clause 49(2)	**Priority 4**					**N/P**	**1**				
147 (2018 & 2024)	Clause 49(3)	**Priority 4**					**N/P**	**1**				
148A (2018 & 2024)	Clause 49(4)	**Priority 4**					**N/P**	**1**				
149 (2018 & 2024)	Clause 49(5)	**Priority 4**					**N/P**	**1**				
149A (2018 & 2024)	Clause 50	**Priority 4**					**N/P**	**1**				
150 (2018 & 2024)	Clause 51(1)	**Priority 4**					**N/P**	**1**				
152 (2018 & 2024)	Clause 51(2) and (3)	**Priority 4**					**N/P**	**1**				
153 (2018 & 2024)	Clause 52(1)	**Priority 4**					N/P	1				
154 (2018 & 2024)	Clause 52(2)	**Priority 4**					N/P	1				
154A (2018 & 2024)	Clause 52(4)	**Priority 4**					N/P	1				

No	Obligation reference	Audit Priority	Controls rating					Compliance rating				
			A	B	C	D	N/P	1	2	3	4	N/R
154AA (2024)	Clause 52(3)	**Priority 4**					N/P	1				
Licence Conditions												
155	Sec 12	**Priority 4**					**N/P**	**1**				
159	Sec 12	**Priority 4**					**N/P**					**N/R**
160	Sec 12	**Priority 4**					**N/P**	**1**				
161	Sec 12	**Priority 4**					**N/P**	**1**				
162	Sec 12	**Priority 4**					**N/P**	1				
163	Sec 12	**Priority 4**					**N/P**	**1**				
165	Sec 12	**Priority 4**					**N/P**	**1**				
167	Sec 12	**Priority 4**					**N/P**	**1**				
168	Sec 12	**Priority 4**					**N/P**					**N/R**
169	Sec 12	**Priority 4**					**N/P**					**N/R**
170A	Sec 12	**Priority 4**					**N/P**					**N/R**
171	Sec 12	**Priority 4**					**N/P**					**N/R**
172	Sec 12	**Priority 4**					**N/P**	**1**				
172A	Sec 12	**Priority 4**					**N/P**					**N/R**
172B	Sec 12	**Priority 4**					**N/P**					**N/R**
181	Sec 12	**Priority 4**					**N/P**					**N/R**
182	Sec 12	**Priority 4**					**N/P**					**N/R**
184	Sec 12	**Priority 4**					**N/P**	**1**				

No	Obligation reference	Audit Priority	Controls rating					Compliance rating				
			A	B	C	D	N/P	1	2	3	4	N/R
185	Sec 12	**Priority 4**					**N/P**	**1**				
186	Sec 12	**Priority 4**					**N/P**	**1**				
187	Sec 12	**Priority 4**					**N/P**	**1**				
188	Sec 12	**Priority 4**					**N/P**	**1**				
189	Sec 12	**Priority 4**					**N/P**	**1**				
190 (2019)	Sec 12	**Priority 4**					**N/P**	**1**				
190A (2024)	Sec 12	**Priority 4**					**N/P**	**1**				
190B (2024)	Sec 12	**Priority 4**					**N/P**					**N/R**
190C (2024)	Sec 12	**Priority 4**					**N/P**					**N/R**
190E (2024)	Sec 12	**Priority 4**					**N/P**	**1**				
190F (2024)	Sec 12	**Priority 4**					**N/P**	**1**				
190G (2024)	Sec 12	**Priority 4**					**N/P**	**1**				

5. Detailed findings, recommendations and action plans

This section has been structured in subsections for the relevant Codes and Regulations against which we assessed Harvey Water's compliance. The sections are:

5.1 Water Services Act

5.2 Water Services Regulations

5.3 Water Services Code of Conduct (Customer Service Standards)

5.4 Other Licence Conditions

5.5 Water Services Code of Practice (Family Violence)

Each section contains:

- **Assessment of compliance and control adequacy** – the conclusions from our audit procedures and our assessment of Harvey Water's compliance with the applicable obligations
- **Findings** – the auditor's understanding of the process and any issues that have been identified during the audit
- **Recommendations (if any) – for improvement or enhancement of the process or control.**

The compliance and control adequacy ratings have been summarised below for each sub-section.

Controls adequacy rating						Compliance rating					
A	B	C	D	NP	Total	1	2	3	4	NR	Total
5.1 Water Services Act											
				58	**58**	**20**				**38**	**58**
5.2 Water Services Regulations											
				10	**10**	**1**				**9**	**10**
5.3 Water Services Code of Conduct (Customer Service Standards)											
				133	133	67	2			64	133
5.4 Other Licence Conditions											
				30	**30**	**19**				**11**	**30**
5.5 Water Services Code of Practice (Family Violence)											
	N/A										
				231	**231**	**107**	**2**			**122**	**231**

5.1 Water Services Act

No	Obligation under Condition	Findings
2	If requested to provide a water service authorised by the licence to a person not covered by section 21(1)(a) but within the operating area of the licence, the licensee must offer to provide the service on reasonable terms, unless provision of the service is not financially viable or is otherwise not practicable. *Sec 21(1)(b)*	NA — Obligation not triggered. A31 (Operations Manager): "HW has not refused any non-potable services requested in this reporting period." Based on samples tested on 10% of new connections, no exemptions noted.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
3	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). *Sec 21(1)(c)*	COMPLIANT - Works continuously operated and maintained. OIM Manual (A12), site checklists (A11), and sampling plan (A10) confirm structured maintenance and monitoring regime. A16 (Training Matrix 2022-23 and 2023-24) confirms qualified workforce with current CPR, first aid, Water Treatment Cert III, and safety competencies maintained throughout the audit period. A12b (WTP O&M Manual MAK5670-MAKSTD-RO-OM Rev0, 30-Mar-21) additionally confirms O&M coverage for the full WTP system (MMF + RO + Dewatering). MAK Water Quarterly Service Reports (Service Reports 25650, 26564, WO12333, 26994, 26995, 28281, 28983, 29931, 30832, 31761, Feb 2024 – Nov 2025) additionally confirm that scheduled quarterly maintenance of the BWRO, MMF, and PWTP was carried out in practice throughout the audit period, consistent with the maintenance regime documented in A12 and A12b. hence, We confirmed the operation and maintenance of the required water services works specified in the licence.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
4	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. *Sec 22*	NA - Obligation not triggered. Client confirmed no service outside licence area. Based on samples tested on 10% of new connections, no exemptions noted.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
5	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. *Sec 23*	COMPLIANT. All water service works used by Harvey Water are either held directly by the licensee (pipe system, bore, WTP, tank, distribution network) or covered by a works holding arrangement. C1 (Water Storage and Taking Agreement, 21 December 2018) between Water

No	Obligation under Condition	Findings
		Corporation and SWIMCO (Harvey Water) confirms the dam assets are held under a formal agreement with commencement date 1 July 2016. A31 management confirmation corroborates. WSA s.23 requirement satisfied throughout the audit period (December 2022 – November 2025).
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
6 (2018 & 2024)	The licensee must provide for an asset management system in respect of the licensee's water service works. *Sections 24(1)(a)*	COMPLIANT. AMS policy (Procedure 02.01) sighted as standalone document formally establishing the asset management system. Asset Management Plan 2024-25 (20240826 AMP 2024-25-F, Version 2 Final for Issue, 65 pages, endorsed by Operations Manager Stephen Cook, July 2024) comprehensively covers all required AMS elements: asset planning, creation, disposal, operations, maintenance (daily through annual schedules), AMS information system (SQL-based, managed by Greenbase/Aquamonix), risk management (ISO 31000:2018), financial planning, capital expenditure, commissioning, review process with defined review periods (Table 8), and performance indicators (Table 9). Water Treatment Assets at Kemerton documented (p.23). OIM Manual (A12), site checklists (A11), sampling plan (A10), training matrix (A16), and Works Procedure Manual (A27) all confirmed. B2 (Asset List) provides the asset register. A33 (PKF Integrity, Feb 2025) provides independent AMS review. Previously flagged gap (overarching AMS policy and asset register not provided) is now resolved.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
8 (2018)	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. *Section 24(1)(c)*	COMPLIANT. The 2022 Asset Management System Review was completed by PAXON and reported by the ERA on 23 November 2023. The current 2026 Review (covering 1 December 2022 to 30 November 2025) has been substantially completed by LAM and will be reported within the ERA-approved timeframe. Harvey Water has continued to satisfy Section 24 throughout the audit period.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
8A (2024)	The licensee's asset management system must include the measures to be taken by the licensee for the proper maintenance of the water service works and the provision and operation of the water	COMPLIANT. The Asset Management Plan 2024-25 (Version 2 Final for Issue, 65 pages) includes comprehensive measures for proper maintenance of water service works as required by Clause 5.1.5: asset maintenance procedures (daily to annual,

No	Obligation under Condition	Findings
	service works, and other water service works necessary for the provision of the water service. *Section 24(2)*	Table 6), forward works planning, condition assessment, risk management (ISO 31000:2018), performance indicators and targets (Table 9), and defined review periods (Table 8). Water treatment assets at Kemerton specifically documented (p.23). AMS information system (SQL-based) tracks scheduled maintenance, costs, shutdown history, works allocation, and individual asset history. OIM Manual (A12), site checklists (A11), and MAK Water quarterly service reports confirm maintenance measures are implemented in practice. A33 (PKF Integrity, Feb 2025) independently confirmed the maintenance framework is operational. A16 (Training Matrix) confirms qualified workforce. Previously flagged gap (overarching AMS policy and updated AMP not sighted) is now resolved.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
9	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. *Section 25*	COMPLIANT — The 2022 operational audit was completed by PAXON and reported by the ERA on 23 November 2023. The current 2026 operational audit (covering 1 December 2022 to 30 November 2025) has been substantially completed by LAM and will be reported within the ERA-approved timeframe. Harvey Water has continued to satisfy Section 25 throughout the audit period.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
10	The licensee must comply with each code of practice made by the Minister to the extent to which it applies to the licensee. *Section 26(3)*	NA - Obligation not triggered. Client confirmed no ministerial code of practice exists.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
13	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 remove any part of the works except with the approval of the Minister. *Section 36*	COMPLIANT for audit period – Continuous service maintained throughout 2022-25; obligation not triggered. Health Dept Reports and compliance submissions confirm ongoing service delivery.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
14	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 specified. *Section 60*	NA - Obligation does not trigger
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
15	The licensee must not supply water services to customers unless the licensee: 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. *Section 70(2)*	COMPLIANT. Harvey Water is a member of the Energy & Water Ombudsman WA (EWOWA) scheme throughout the audit period, as evidenced by: (1) two EWOWA membership invoices (INV-1588 and INV-1606) confirming financial participation; (2) Customer Service Charters (HW and RWS) referencing EWOWA complaint pathway and contact details; (3) A31 management confirmation. All three elements of WSA s.70(2) satisfied — membership, bound by scheme, and compliance with ombudsman decisions.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
16	The licensee must take reasonable steps to minimise the extent or duration of any interruption of water services it is responsible for. *Section 77(3)*	COMPLIANT — Client confirmed (A31): HW is a member of the EWOWA scheme. A31 Col K references membership invoices and website shutdown notice page confirmed accessible (16 March 2026). Charters (A25) confirm EWOWA escalation path published to customer
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
17	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. *Sections 82(4) & (5)*	NA - Obligation not triggered per client response. Non-potable supply context.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
18	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. *Section 84(2)*	NA — Obligation not triggered. Client confirmed (A31): no activity under section 83(3) during the audit period. No notices issued under s.83(3)(a).
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
19	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. *Section 87(2)*	NA - Obligation not triggered. No SAT application made during reporting period per client.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
20	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 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. *Section 90(7)*	COMPLIANT - C5 (Compliance Notice, 29 August 2024) demonstrates Harvey Water's compliance with WSA s.90(7). The notice was issued under s.90(5) to Rogerson PA & KG (landowners) regarding unauthorized works by Daniel Phillips Contractor in the vicinity of water service works. The notice addresses both the person undertaking works and the landowner, evidencing consultation with the owner of the land as required. Procedures 02.05 and 02.13 document the established process. Remedial costs of $13,337.97 were documented.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
22	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. *Section 96(1)*	NA - Obligation not applicable. Harvey Water does not provide water supply reticulation works for occupied dwellings.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
23	The licensee must comply with requests made by FESA or a local government under sections 96(3) and 96(4) of the Act to the extent practicable and within a reasonable time. *Section 96(5)*	NA - Obligation not applicable. Harvey Water does not provide water supply reticulation works for occupied dwellings.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
28	The licensee must include the information specified in a compliance notice given in relation to the matters set out in section 119(1). *Sec 119(2)*	NA - Not applicable during period
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
29	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. *Sec 122(2)*	NA - Obligation not triggered per client. No SAT application in reporting period.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
30	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 in excess of the relevant fee schedule. *Sec 125(2)*	NA - Not applicable
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
31	If the licensee has previously lodged a memorial with the Registrar, the licensee must lodge a withdrawal of memorial with Registrar along with the specified fee (if any) if the charge or contribution has been paid. *Sec 128(4)*	COMPLIANT. C6 (Caveat Register 2022 Onwards) demonstrates Harvey Water maintains an active memorial withdrawal process. REMOVED sheet documents 7 caveats withdrawn during the audit period (2024-2025) after payment received, with caveat numbers, customer details, and removal dates recorded. The register evidence systematic compliance with WSA s.128(4) — memorials are lodged for connection loans and withdrawn once the charge or contribution has been paid. A31 management confirmation corroborates.

No	Obligation under Condition	Findings
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
32	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. *Sec 129(5)*	COMPLIANT — B5c (shutdown register) reviewed confirming 15 scheduled shutdowns during audit period. A25 Customer Service Charter documents minimum 5 business days written/SMS advance notice for planned interruptions. Client confirmed (A31): notifications provided via website and directly to customers. Shutdown notification process operating in practice throughout audit period.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
33	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. *Sec 139(3)*	NA - Obligation not triggered. Client confirmed no fence/gate works during audit period.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
34	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' notice to the public authority that has control or management of the road. *Sec 141(1)*	COMPLIANT. Both road entry incidents during the audit period are supported by professional Traffic Management Plans: (1) Government Road, Wokalup — CB Traffic Solutions TMP (CB 10646 Rev C, 15/10/2025), road authority authorised, pipe diversion works 27/10-31/10/2025; (2) Coronation Rd & Fawcett Rd, Waroona — Traffic Force TMP (R5235-2024, Rev A 20/08/2024), pipe repair works 2-4 September 2024. WSA s.141(1) requirements satisfied for both incidents.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
35	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. *Sec 142*	NA - Major Works not applicable per client confirmation.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
36	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. *Sec 143(2)*	NA - Major Works not applicable per client confirmation.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
37	The licensee must, within 5 days of publishing the plans and details on the licensee's website, give notice setting out the matters specified in section 143(4) to the persons and agencies specified. *Sec 143(3)*	NA - Major Works not applicable per client confirmation.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
38	The licensee must have regard to an objection or submission lodged within the relevant period. *Sec 144(3)*	NA - Major Works not applicable per client confirmation.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
39	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. *Sec 145(2)*	NA - Major Works not applicable per client confirmation.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
40	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). *Sec 147(3)*	NA - Major Works not applicable per client confirmation.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
41	If the Minister gives a direction that further notices in relation to the proposed major works be given	NA - Major Works not applicable per client confirmation.

No	Obligation under Condition	Findings
	under section 143(3), the licensee must resubmit the proposal. *Sec 147(4)*	
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
42	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. *Sec 151(1)*	NA - Not applicable during period
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
43	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. *Sec 151(2)*	NA - Not applicable during period
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
44	The licensee must have regard to an objection or submission lodged by the date specified in the notice given under section 151(2). *Sec 152(3)*	NA - Not applicable during period
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
45	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. *Sec 153(3)*	NA - Not applicable during period
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
45A (2024)	A licensee, when providing water service works, may: deviate from any plan or description of, or proposal for, those works and make any modification to the plan, description or proposal that is required by the circumstance, if the	NA - Not applicable during period

No	Obligation under Condition	Findings
	deviation or modification is agreed to in writing by the owner and occupier of the affected land. *Section 160(1)*	
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
46	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. *Section 166(5)*	NA - Not applicable during period
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
47	Any costs incurred in taking an interest in land are to be paid by the licensee. *Section 166(6)*	NA - Not applicable during period
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
48	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 Planning and Development Act 2005, unless the Minister permits the licensee to do so. *Section 170*	NA — Obligation not triggered. Client confirmed (A31): no sale of interests in land triggering s.170 occurred during audit period.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
49	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. *Section 173(4)*	COMPLIANT — B5c (shutdown register) reviewed confirming advance notice provided for scheduled works. A25 Customer Service Charter (reviewed) documents minimum 5-business-day notice requirement. A13 Procedure 02.10 (reviewed) documents written notice of entry requirements. Client confirmed (A31): notifications provided via website and direct customer contact.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
50	Notice of a proposed entry by the licensee must be in writing and must set out the purpose of the entry,	COMPLIANT — A25 Customer Service Charter (reviewed) and A13 Procedure 02.10 (reviewed)

No	Obligation under Condition	Findings
	including (if applicable) any work proposed to be carried out. *Section 174(1)*	confirm written notice of entry includes purpose of entry and prescribed notice periods consistent with s.174(1). B5c shutdown register confirms scheduled works notified in practice. Client confirmed (A31): minimum 5 business days written/SMS notice provided.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
51	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. *Section 174(3)*	COMPLIANT — A25 Customer Service Charter (reviewed) documents best endeavours notice obligations for routine access including calling card and SMS notification where landowner uncontactable. Client confirmed (A31): process consistently applied. Consistent with s.174(3) requirement.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
52	If an occupier is present when the licensee proposes to enter a dwelling, the licensee must perform the specified actions before entering the premises. *Section 175(2)*	NA — Obligation not triggered. Client confirmed (A31): HW employees only enter within boundary fence for supply point access. No entry to dwellings occurs in the provision of this non-potable service.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
53	If the licensee enters a dwelling that is unoccupied, the licensee must leave a notice, which includes the specified information, or a copy of the warrant (as applicable) in a prominent position in the dwelling before leaving the dwelling. *Section 175(5)*	NA — Obligation not triggered. Client confirmed (A31): non-potable supply at boundary only — HW does not enter dwellings. Obligation to leave notice in unoccupied dwelling not triggered.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
54	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. *Section 176(1)*	NA — Obligation not triggered. Client confirmed (A31): no instances of consent withdrawal requiring departure from premises during audit period.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
55	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. *Section 176(3)*	COMPLIANT. C8 (Notice of Entry / Release of Restoration template) demonstrates Harvey Water's compliance with WSA s.176(3). The template explicitly states, "in compliance with WSA 176(3) they will produce their Harvey Water identity badge," confirming that staff carry identity badges as certificates of authority. The template also references WSA ss.129(5), 139(3), 173(4), 174(1)(3) and includes reinstatement obligations under s.218(3). A31 confirms the notice of entry process is operational — works only commence once the form is signed.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
56	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. *Section 176(4)*	NA — Obligation not triggered. Client confirmed (A31): no instances during audit period where authority could not be produced on request.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
57	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. *Section 181*	NA — Obligation not triggered. Client confirmed (A31): no incidents or complaints relating to unreasonable interference with occupier activities.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
58	If the licensee applies for a warrant, the application must contain the prescribed information. *Section 186*	NA - Obligation not triggered per client. Non-potable supply context; no warrants required.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
59	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. *Sections 187(1) - (3)*	NA - Obligation not triggered per client. Non-potable supply context; no warrants required.

No	Obligation under Condition	Findings
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
60	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 concerned on entry (if practicable), and if requested to do so. *Section 190(4)*	NA - Obligation not triggered per client. Non-potable supply context; no warrants required.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
61	On completing the execution of a warrant, the licensee must record the specified information on that warrant. *Section 190(5)*	NA - Obligation not triggered per client. Non-potable supply context; no warrants required.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
62	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 specified information. *Section 210(5)*	NA - Obligation not triggered per client. Non-potable supply context; no warrants required.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
63	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. *Section 218(2)*	COMPLIANT. Obligation triggered: Harvey Water exercised works powers throughout the audit period (2 confirmed road entry incidents per Ob.34/75; routine maintenance operations). A13 Procedure 02.10 (s.3.3) documents damage minimisation obligations. A27 Works Procedure Manual requires site restoration post-works with property owner sign-off. No physical damage incidents or complaints identified during the audit period, indicating damage minimisation procedures operating effectively. Note: Client self-assessed NA in A31 (based on no damage occurring), but s.218(2) is a continuous obligation to minimise obstruction and damage whenever works powers are exercised — it is not contingent on damage actually occurring. Works powers were exercised; procedures were in place and followed. Rated COMPLIANT.

No	Obligation under Condition	Findings
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
64	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. *Section 218(3)*	COMPLIANT (NOT TRIGGERED) — WSA s.218(3) requires make-good of physical damage caused in exercise of works power. Procedure 02.10 documents damage minimisation and site restoration obligations. Client confirmed (A31) make-good policy applied — 'as was' condition minimum. No physical damage incidents identified during the audit period (Dec 2022–Nov 2025) in any documentation sighted. Obligation not triggered during the audit period. No compliance issue arises.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

5.2 Water Services Regulations

No	Obligation under Condition	Findings
66	If the licensee gives a compliance notice to a person in respect of access to meters, the notice must specify the specified information. *Reg 24(4)*	NA - Obligation not triggered per client. No meter compliance notice issued in reporting period.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
67	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. *Reg 26(3)*	NA - Obligation not triggered. No meter test requests received during reporting period per client.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
68	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). *Reg 26(5)*	NA - Obligation not triggered. No meter tests conducted as no requests received per client.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
69	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. *Reg 29(1)*	NA - Client confirmed no infrastructure contributions required during the audit period. HW does not levy infrastructure contributions in the circumstances described. Obligation not triggered.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
70	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 to the owner or occupier). *Reg 42(2)*	NA - Obligation not triggered per client. Non-potable supply; no backflow orders issued.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
71	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). *Reg 43(3)*	NA - Obligation not triggered per client. Non-potable supply; no backflow orders issued.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
72	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 to the owner or occupier). *Reg 43(6)*	NA - Obligation not triggered per client. Non-potable supply; no backflow orders issued.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
74	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. *Regulation 60(2)*	NA - Client confirmed no alteration of existing infrastructure required during audit period. Obligation not triggered.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
75	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. *Regulation 63*	COMPLIANT. Both road opening incidents during the audit period are supported by professional TMPs documenting reinstatement scope and hazard prevention: (1) Government Road, Wokalup — reinstatement within 27/10-31/10/2025 works program; (2) Coronation Rd & Fawcett Rd, Waroona — reinstatement within 2-4 Sep 2024 works program. A31 confirms reinstatement completed per Main Roads WA and shire requirements. Reg.63 requirements satisfied.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
89	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. *Regulation 65*	NA — Obligation not triggered. Client confirmed (A31): no compliance notices were issued under the Water Services Regulations 2013 during the audit period. Regulation 65 content requirements therefore not triggered.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

5.3 Water Services Code of Conduct (Customer Service Standards)

No	Obligation under Condition	Findings
92	The licensee must have written information for customers about the specified matters regarding connections and the information must be publicly available. Note: the information required by subclause 8(2)(a) applies to the Water Corporation, Bunbury Water Corporation and Busselton Water Corporation only and the information required by subclause 8(2)(g) applies only to licensees that supply potable water. *Clause 8(1)-(3)*	SCOPE (ERA 17 Mar 2026): Code of Conduct obligations apply to Albemarle Lithium (potable customer) only. RWS/irrigation connections are OUT OF SCOPE. N/A — Audit reviewed the new connections register (53 RWS supply points installed 1 Dec 2022 to 30 Nov 2025). All connections are non-potable RWS supply points. No new potable water connections were made in the audit period. Albemarle Lithium (the potable customer) is an existing customer — obligation not triggered for the audit period.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
93	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. *Clause 9(2) and (4)*	SCOPE (ERA 17 Mar 2026): Code of Conduct obligations apply to Albemarle Lithium (potable customer) only. RWS/irrigation connections are OUT OF SCOPE. N/A — Audit reviewed the new connections register (53 RWS supply points installed 1 Dec 2022 to 30 Nov 2025). All connections are non-potable RWS supply points and do not constitute 'standard supply connections' under Cl. 9(1) (metered 20mm potable water pipe to existing main). No new potable water connections were made in the audit period. Albemarle Lithium (the potable customer) is an existing customer — obligation not triggered for the audit period. [NOT RATED — for record only] 5 RWS connection samples reviewed and documented in WP-CONN-01. Out of scope per ERA 17 March 2026 confirmation.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
94	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. *Clause 10(2)*	NA — No fixed charge billed to Albemarle. IWSA is a consumption-only billing arrangement (charge type: "Albemarle IWSA water consumption" at $/ML). No separate fixed/standing charge levied. Obligation not triggered. Evidence: WP-ALB-BILL-01; invoice 1-INV0022885.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
95	If the licensee charges a quantity charge, the licensee must issue a bill for a quantity charge at least once in every 4-month period to each customer.	COMPLIANT — WP-ALB-BILL-01: 37 invoices issued Dec 2022–Nov 2025, all approximately monthly (every 27–35 days). Billing frequency well within the requirement of at least once per 4-month

No	Obligation under Condition	Findings
	Clause 11(2)	period. Evidence: WP-ALB-BILL-01 billing reconciliation; invoices
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
96	A bill for usage must be based on a meter reading to ascertain the quantity supplied or discharged. *Clause 11(3)*	COMPLIANT — all invoices based on actual meter readings from 3 Albemarle supply points (SP67029 aquifer, SP67018 raw water, SP67022 raw water). On/off meter readings shown per invoice. Volume reconciliation confirms readings match billed volumes within rounding tolerance (≤0.01 ML) across 19 sampled invoices; no discrepancies found.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
97	If an accurate meter reading is not possible, a bill for usage must be based on an estimate, in accordance with the specified regulations (if any), of the quantity of water supplied or wastewater discharged. *Clause 11(4)*	NA — WP-ALB-BILL-01: no estimated meter readings identified across 37 invoices in audit period. Obligation not triggered. All billing based on actual
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
98	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 specified methods. *Clause 11(5)*	NA — WP-ALB-BILL-01: no estimated readings. Obligation not triggered.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
98A	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. *Clause 11(6)*	COMPLIANT — WP-ALB-BILL-01: all 37 invoices based on actual meter readings (no estimates); meter-based bills issued monthly throughout audit period, satisfying the requirement of at least one meter-based bill per 12-month period.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
99 (2018 & 2024)	A bill must be sent to the address of the place where the water service is provided or, to another address nominated by the customer. *Clause 12(3)*	COMPLIANT — Invoice 1-INV0022885: billed to ALBEMARLE LITHIUM PTY LTD, Level 1, 197 St Georges Tce, Perth WA 6000 — customer-nominated billing address. WP-ALB-BILL-01 confirms address consistent across audit period (account transition from 7064/Applecross to 7077/Perth documented in F5).
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
99A	A licensee must allow a customer to choose to receive bills by post or email. *Clause 12(1)*	COMPLIANT — Albemarle billing delivered to nominated postal/email address per IWSA agreement. Client confirmed (A31). Invoice 1-INV0022885 confirms billing address established by customer. No complaint or issue regarding billing method identified.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
99B	A licensee must inform the customer of any charge for sending a bill when offering the choice under subclause 12(1). *Clause 12(2)*	COMPLIANT — 37 Invoices reviewed: no charge for bill delivery included on invoice. Client confirmed (A31) no fees charged for sending bills.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
99C	A bill sent by email must be sent to an email address provided by the customer. *Clause 12(4)*	COMPLIANT — Invoices delivered to Albemarle billing contact per IWSA agreement. No incorrect email delivery identified. Client confirmed (A31).
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
99D	A licensee must not charge for sending a bill when any one of the specified situations apply to the customer. *Clause 12(5)*	COMPLIANT — no bill delivery fee charged for 37 invoices. Client confirmed (A31) no charge for sending bills in applicable circumstances.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
100	Each bill must contain the prescribed information. *Clause 13(2)*	COMPLIANT — all prescribed bill content required under Clause 13(2) (Reg.14) is included on Harvey Water bills. Identified content gaps (Reg.14(i)(j)(k)

No	Obligation under Condition	Findings
		and (p)) have been addressed by Harvey Water with updated bill template (April 2026). Evidence: Updated bill template review (April 2026); WP-ALB-BILL-01 (37 invoices issued Dec 2022–Nov 2025); Bill Content Checklist confirms compliance.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
100A (2018 & 2024)	A bill issued for 2 or more water services must specify the charge payable for each water service. *Clause 13(7)*	NA — single charge type (Albemarle IWSA water consumption only). Only one water service billed to Albemarle. Obligation to specify charge per service when 2+ services billed not triggered.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
101 (2018 & 2024)	Each bill for usage for a metered water service must contain the specified information. *Clause 13(3)*	COMPLIANT — the specified information for metered water service bills required under Clause 13(3) (2024 Code), Reg.15 is included on Harvey Water bills. Reg.15(a)–(d), (f) confirmed present and correct on all sighted invoices; Reg.15ie(e) gap on overcharge invoice 1-INV0015255 was remediated by credit note 1-CRM0000231. Updated billing procedures confirmed by Harvey Water (April 2026).
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
101A (2018 & 2024)	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. *Clause 13(4)*	NA — no estimated readings across 37 invoices. Obligation (estimated bill must inform customer) not triggered during audit period.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
102A (2018 & 2024)	Each bill must contain the prescribed information. *Clause 13(5)*	COMPLIANT — the prescribed bill information under Clause 13(5) (2024 Code), Reg.16 is included on Harvey Water bills. Reg.16(b)–(i) confirmed present and correct; Reg.16(a) water quality notice now correctly applied to potable supply per updated invoice template (April 2026).
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
103	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. *Clause 14(1)*	NA — no estimated readings in audit period. Obligation to explain estimation basis on request not triggered.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
104	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 reasonable having regard to a subsequent and accurate meter reading. *Clause 14(2)*	NA — no estimated readings. No adjustment obligations triggered.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
104A	Each bill for usage to which clause 15 applies must, in addition to the requirements of clause 13, contain the specified information. *Clause 15(3)*	NA — single consumption rate (IWSA $/ML — not tiered volumetric billing). Clause 15-tiered billing information requirements not
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
105	The licensee must provide to the customer on request either or both of the following: a meter reading and a bill to determine the outstanding charges for a period that is not the same as the usual bill cycle, if the customer disputes an estimate on which a bill is based, a meter reading and revised bill. *Clause 16(1)*	NA — no on-request meter reads, or special billing runs for Albemarle identified during audit period. Obligation not triggered.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
106	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. *Clause 17(2) and (3)*	COMPLIANT — A25 RWS Customer Service Charter (reviewed) and RWS website policies page (reviewed 16 March 2026, rws.harveywater.com.au/policies.html) confirm written leak allowance policy is in place and publicly available. Client confirmed (A31).
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
107	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. *Clause 18(2)*	COMPLIANT — WP-ALB-BILL-01 : undercharge of ~$1,146 identified for May–Jun 2024 (Year 5 rate applied after 1 May 2024 when Year 6 rate should have applied). This amount was undercharged within the 12-month recoverable period — recovery window has not expired. No correcting invoice has been issued; Obligation satisfied as the 12-month recovery limit has not been breached. .
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
108	An undercharged amount must be the subject of, and explained in, a special bill or a separate item in the next bill. *Clause 18(3)*	NA — WP-ALB-BILL-01: undercharge (F3, ~$1,146) has not yet been invoiced to Albemarle. Obligation to explain undercharge in a special bill not yet triggered. If Harvey Water issues a supplementary invoice, this obligation will apply.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
109	Subject to subclauses 18(6), (7), (8) or (9), the licensee must not charge interest or late payment fees on an undercharged amount. *Clause 18(4)*	COMPLIANT — no interest or late payment fees charged on any undercharged amount. 37 Invoices show $0 Tax Total and no late fees.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
110	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 specified periods starting on the day that the bill in subclause 18(3) is issued. *Clause 18(5)*	NA — undercharge not yet invoiced. If invoiced, Albemarle would be entitled to a repayment plan. Obligation not yet triggered.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
111A	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. *Clause 19(2)*	COMPLIANT — overcharge on 1-INV0015255 (31-Jul-2024) — incorrect rate $834.15/ML applied instead of contracted IWSA Year 6 rate $697.88/ML on 21.93 ML. Credit Note 1-CRM0000231 issued 9-Aug-2024 — within 10 calendar days, well within the 15-business-day requirement. Overcharge self-identified and credited promptly.

No	Obligation under Condition	Findings
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
112A	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. *Clause 19(3)*	COMPLIANT — Credit Note 1-CRM0000231 ($3,116.17) issued 9-Aug-2024 — applied to Albemarle account within 15 business days of identifying the overcharge.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
112B	If instructions from the customer about the refunding or crediting of the overcharged amount are not received by the licensee by the end of the period of 10 business days starting on the day on which 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. *Clause 19(4)*	NA — credit (1-CRM0000231) was issued promptly within 15 business days. The scenario where no instructions are received within 20 days did not arise. Obligation not triggered in this form.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
112C	The licensee must notify the customer immediately after crediting the overcharged amount to the customer's account under clause 19. *Clause 19(5)*	COMPLIANT — WP-ALB-BILL-01: credit applied per 1-CRM0000231. Invoice 1-INV0015449 (27-Aug-2024) shows account balance cleared. Client confirmed (A31): notification sent to customer on completion. Evidence: WP-ALB-BILL-01; A31.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
113	The licensee must review a bill on the customer's request. *Clause 21(1)*	COMPLIANT — "Review My Invoice" procedure confirmed published on RWS website (rws.harveywater.com.au/policies.html, reviewed 16 March 2026). Client confirmed (A31): all customer account enquiries reviewed on request. No Albemarle bill review requests
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
113A (2024)	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 20 business days from the day the customer's request for review was received. *Clause 21(2)*	NA — no bill review requests from Albemarle identified during audit period. A3 confirms 0 complaints all 3 years. Obligation not triggered.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
113B (2024)	If the licensee does not complete a review before the end of the 20 business days, the licensee must notify the customer of the status of the days from the day the customer's request for review was received. *Clause 21(3)*	NA — No bill reviews initiated. Obligation not triggered.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
114 (2018 & 2024)	The licensee must have a written procedure for the review of a bill on the customer's request. *Clause 22(1)*	COMPLIANT — Written "Review My Invoice" procedure confirmed published on RWS website (reviewed 16 March 2026). Client confirmed (A31).
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
115 (2018 & 2024)	The review procedure in clause 22(1) 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. *Clauses 22(2) & (4)*	COMPLIANT — Review procedure confirmed published on RWS website (reviewed 16 March 2026) and available as hardcopy on request per A25 Charter. Client confirmed (A31).
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
116 (2018 & 2024)	The review procedure must state that the customer may, but is not required 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. *Clause 22(3)*	COMPLIANT — Review procedure confirmed on RWS website (reviewed 16 March 2026) includes complaints pathway reference per Cl 20(4)/22(3). Client confirmed (A31).
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
117 (2018)	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. *Clause 20(5), to July 2024*	COMPLIANT — Client confirmed (A31): invoice queries investigated and discussed within 48 hours of contact. Review My Invoice procedure confirmed on RWS website (reviewed 16 March 2026).
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
117A (2018 & 2024)	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 subclause 20(2). *Clause 20(1)*	COMPLIANT — A25 Customer Service Charter (reviewed) documents annual charge notification obligations. Website charges schedules (A25) confirmed published. Client confirmed (A31): members and customers notified within 5 business days of start of each financial year (1 July 2023, 1 July 2024, 1 July 2025). Communications register and example emails referenced in A31.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
118 (2018 & 2024)	The time set by the licensee for the payment of a bill must be after 14 days from when the bill is issued. *Clause 24*	COMPLIANT — 37 Invoices sighted, 60-day payment terms confirmed, well exceeding the minimum 14-day payment period.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
119 (2018 & 2024)	The licensee must allow a customer to pay a bill using any of the specified methods selected by the customer. *Clause 25(1)*	COMPLIANT — 37 invoices sighted: payment options listed — EFT (BSB 036 152, Acc 175381), BPAY (Biller Code 329342, Ref 70466), online credit card (harveywater.com.au), and telephone credit card. Multiple prescribed payment methods available.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
120 (2018 & 2024)	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. *Clause 25(2)*	COMPLIANT — 37 invoices sighted, no fees listed for any payment method. Client confirmed (A31): HW does not pass on charges for any payment method.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
121 (2018 & 2024)	Before receiving a bill payment by direct debit, the licensee must obtain written or oral express consent of the customer or of an adult person nominated by the customer to give consent. *Clause 26*	NA — No direct debit arrangement identified for Albemarle. 37 Invoices show full payment applied by other means. Obligation not triggered.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
122 (2018 & 2024)	The licensee must accept payment in advance from a customer on a customer's request. *Clause 27(1)*	NA — no advance payment requests from Albemarle during audit period. Obligation not triggered.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
123 (2018 & 2024)	The licensee must on request and at no charge redirect a customer's bills because of the customer's absence or illness. *Clause 28*	NA — No bill redirection requests. Obligation not triggered.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
123A (2024)	For each bill issued, the licensee must allow customers (all residential customers and the business customers who have notified the licensee that they are experiencing payment difficulties) to select one of the following options: Additional time to pay a bill, or Choosing a payment plan for an amount owing by the customer to the licensee. *Clause 29(1)-(2)*	NA — Albemarle is an industrial business customer and has not notified Harvey Water of a preference for instalment billing per Cl 29(1)-(2). Obligation not triggered for this customer.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
124A (2018)	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. *Clause 28(2) to July 2024*	NA — Clause 28 (2018 Code) applies to residential customers only. Harvey Water has no residential customers. ERA exemption from Financial Hardship Policy confirmed by ERA letter dated 17 July 2014 (A29). A31 (client response): Ob 124A = "Exempt ERA letter"; Ob 124B/124C = HW voluntarily offers payment arrangements. Obligation does not apply.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
124B (2018 & 2024)	When formulating a payment plan to assist a customer the licensee must take the customer's capacity to pay any bill. 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. *Clause 30(1)*	NA — Clause 30(1) (2024 Code) applies to residential customers only. Harvey Water has no residential customers. ERA exemption from Financial Hardship Policy confirmed by ERA letter dated 17 July 2014 (A29). A31 (client response): Ob 124A = "Exempt ERA letter"; Ob 124B/124C = HW voluntarily offers payment arrangements. Obligation does not apply.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
124C (2018)	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. *Clause 28(4) to July 2024*	NA — Clause 28 (2018 Code) applies to residential customers only. Harvey Water has no residential customers. ERA exemption from Financial Hardship Policy confirmed by ERA letter dated 17 July 2014 (A29). A31 (client response): Ob 124A = "Exempt ERA letter"; Ob 124B/124C = HW voluntarily offers payment arrangements. Obligation does not apply.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
124D (2024)	If a customer accepts a payment plan, the licensee must provide the customer the specified information in writing within 5 business days of the customer accepting the payment plan, unless the customer has provided the specified information in the preceding 12 months. *Clause 30(4)*	NA — No payment plan for Albemarle. Obligation not triggered.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
124F (2024)	A licensee must, in relation to a business customer, consider and decide whether a payment plan should be interest-free, fee-free or both. *Clause 30(7)*	NA — No payment plan for Albemarle. Obligation not triggered.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
124G (2024)	A licensee must review a payment plan at the request of a customer. *Clause 31(1)*	NA — No payment plan for Albemarle. Obligation not triggered.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
124H (2024)	The licensee must offer to vary a payment plan if a review of the payment plan, under subclause 31(1), indicates that the customer is unable to meet the payment plan obligations. *Clause 31(2)*	NA — No payment plan for Albemarle. Obligation not triggered.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
124I (2024)	The licensee must, within 5 business days after the customer accepts an offer to vary the payment plan, provide the customer with information that clearly explains, and assists the customer to understand the variation. *Clause 31(3)*	NA — No payment plan for Albemarle. Obligation not triggered.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
124J (2024)	A licensee must not vary a payment plan without the customer's agreement, where the agreement relates to the particular variation rather than under a general agreement to future variations. *Clause 31(4) and (5)*	NA — No payment plan for Albemarle. Obligation not triggered.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
133 (2018 & 2024)	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. *Clauses 34(4) and (5)*	COMPLIANT. Scope: Albemarle Lithium (potable customer) only (ERA confirmation 17 March 2026). Written information regarding payment schemes and assistance is confirmed available: (1) RWS Customer Service Charter (Oct 2024, s.3.2) documents payment plan assistance and EWOWA contact details — published on website; (2) Procedure_03.06 documents two written payment plan options (Bill Smoothing, Payment Difficulty); (3) Hardcopy available on request. Cl.31(4)-(5) requirements satisfied. HW exempt from Financial Hardship Policy per ERA letter (21 Jul 2014, WL31 Cl.30.1).
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
133A (2018 & 2024)	The licensee must not charge interest or fees for late payment of a bill by a customer in the specified circumstances. *Clause 35*	COMPLIANT — no interest or late payment fees charged on any Albemarle invoice across the full audit period (37 invoices). Invoices show $0 Tax Total and $0.00 Total Payable (paid in full, no fees).

No	Obligation under Condition	Findings	
Priority 4		**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings	
134 (2018 & 2024)	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 or is being assessed for financial hardship. *Clause 36(1)(a)-(c)*	NA - Harvey Water is exempt from the Financial Hardship Policy requirement. A29 (ERA letter, 21 Jul 2014) confirms ERA granted exemption under WL31 Clause 30.1 as HW supplies non-potable water to non-residential customers/members only. A25 Customer Service Charters confirm nature of service unchanged. Obligation does not apply during the audit period.	
Priority 4		**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings	
134A (2018 & 2024)	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 the licensee (or is not determined or is upheld by the ombudsman). *Clause 36(1)(d)-(e)*	NA — Not applicable to Albemarle Lithium (potable customer) in the audit period. Scope: All Code of Conduct obligations apply to Albemarle only (ERA confirmation, Alison Ovenden, 17 March 2026). This obligation relates to supply restriction / debt recovery procedures and is event-triggered — it only applies if a restriction or debt recovery action is taken against the customer. Albemarle (Accounts 7064 and 7077) has no supply restrictions, no dunning/reminder notices, no debt recovery action, and no payment defaults recorded during the audit period (1 December 2022 – 30 November 2025). Confirmed from: BOB extract (37 invoices — all paid in full, Payments Applied = Total on every invoice); Barred Customer Register (Albemarle not listed); client confirmation (A31).	
Priority 4		**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
135 (2018 & 2024)	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. *Clause 43(1)*	NA — Not applicable to Albemarle Lithium (potable customer) in the audit period. Scope: All Code of Conduct obligations apply to Albemarle only (ERA confirmation, Alison Ovenden, 17 March 2026). This obligation relates to supply restriction / debt recovery procedures and is event-triggered — it only applies if a restriction or debt recovery action is taken against the customer. Albemarle (Accounts 7064 and 7077) has no supply restrictions, no dunning/reminder notices, no debt recovery action, and no payment defaults recorded during the audit period (1 December

No	Obligation under Condition	Findings
		2022 – 30 November 2025). Confirmed from: BOB extract (37 invoices — all paid in full, Payments Applied = Total on every invoice); Barred Customer Register (Albemarle not listed); client confirmation (A31).
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
136 (2018 & 2024)	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. *Clause 43(2)*	NA — Not applicable to Albemarle Lithium (potable customer) in the audit period. Scope: All Code of Conduct obligations apply to Albemarle only (ERA confirmation, Alison Ovenden, 17 March 2026). This obligation relates to supply restriction / debt recovery procedures and is event-triggered — it only applies if a restriction or debt recovery action is taken against the customer. Albemarle (Accounts 7064 and 7077) has no supply restrictions, no dunning/reminder notices, no debt recovery action, and no payment defaults recorded during the audit period (1 December 2022 – 30 November 2025). Confirmed from: BOB extract (37 invoices — all paid in full, Payments Applied = Total on every invoice); Barred Customer Register (Albemarle not listed); client confirmation (A31).
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
137A (2018 & 2024)	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 38), the water service charge has still not been paid in full, and the licensee has given the customer a restriction notice. *Clause 39(1)*	NA — Not applicable to Albemarle Lithium (potable customer) in the audit period. Scope: All Code of Conduct obligations apply to Albemarle only (ERA confirmation, Alison Ovenden, 17 March 2026). This obligation relates to supply restriction / debt recovery procedures and is event-triggered — it only applies if a restriction or debt recovery action is taken against the customer. Albemarle (Accounts 7064 and 7077) has no supply restrictions, no dunning/reminder notices, no debt recovery action, and no payment defaults recorded during the audit period (1 December 2022 – 30 November 2025). Confirmed from: BOB extract (37 invoices — all paid in full, Payments Applied = Total on every invoice); Barred Customer Register (Albemarle not listed); client confirmation (A31).
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
137B (2018 & 2024)	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. *Clause 39(2)*	NA — Not applicable to Albemarle Lithium (potable customer) in the audit period. Scope: All Code of Conduct obligations apply to Albemarle only (ERA confirmation, Alison Ovenden, 17 March 2026). This obligation relates to supply restriction / debt recovery procedures and is event-triggered — it only applies if a restriction or debt recovery action is taken against the customer. Albemarle (Accounts 7064 and 7077) has no supply restrictions, no dunning/reminder notices, no debt recovery action, and no payment defaults recorded during the audit period (1 December 2022 – 30 November 2025). Confirmed from: BOB extract (37 invoices — all paid in full, Payments Applied = Total on every invoice); Barred Customer Register (Albemarle not listed); client confirmation (A31).
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
137C (2018 & 2024)	The restriction notice must include the specified information. *Clause 39(3)*	NA — Not applicable to Albemarle Lithium (potable customer) in the audit period. Scope: All Code of Conduct obligations apply to Albemarle only (ERA confirmation, Alison Ovenden, 17 March 2026). This obligation relates to supply restriction / debt recovery procedures and is event-triggered — it only applies if a restriction or debt recovery action is taken against the customer. Albemarle (Accounts 7064 and 7077) has no supply restrictions, no dunning/reminder notices, no debt recovery action, and no payment defaults recorded during the audit period (1 December 2022 – 30 November 2025). Confirmed from: BOB extract (37 invoices — all paid in full, Payments Applied = Total on every invoice); Barred Customer Register (Albemarle not listed); client confirmation (A31).
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
138 (2018 & 2024)	The licensee must not start a water supply restriction if any of the specified circumstances apply. *Clause 40(1)(a) and (c)-(d)*	NA — Not applicable to Albemarle Lithium (potable customer) in the audit period. Scope: All Code of Conduct obligations apply to Albemarle only (ERA confirmation, Alison Ovenden, 17 March 2026). This obligation relates to supply restriction / debt recovery procedures

No	Obligation under Condition	Findings
		and is event-triggered — it only applies if a restriction or debt recovery action is taken against the customer. Albemarle (Accounts 7064 and 7077) has no supply restrictions, no dunning/reminder notices, no debt recovery action, and no payment defaults recorded during the audit period (1 December 2022 – 30 November 2025). Confirmed from: BOB extract (37 invoices — all paid in full, Payments Applied = Total on every invoice); Barred Customer Register (Albemarle not listed); client confirmation (A31).
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
138A (2018)	The licensee must not start a water supply restriction if the specified circumstances apply. *Clause 37(1)(f)(g) to July 2024*	NA — Not applicable to Albemarle Lithium (potable customer) in the audit period. Scope: All Code of Conduct obligations apply to Albemarle only (ERA confirmation, Alison Ovenden, 17 March 2026). This obligation relates to supply restriction / debt recovery procedures and is event-triggered — it only applies if a restriction or debt recovery action is taken against the customer. Albemarle (Accounts 7064 and 7077) has no supply restrictions, no dunning/reminder notices, no debt recovery action, and no payment defaults recorded during the audit period (1 December 2022 – 30 November 2025). Confirmed from: BOB extract (37 invoices — all paid in full, Payments Applied = Total on every invoice); Barred Customer Register (Albemarle not listed); client confirmation (A31).
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
138B (2018 & 2024)	The licensee must not start a water supply restriction on or during the specified times. *Clause 41*	NA — Not applicable to Albemarle Lithium (potable customer) in the audit period. Scope: All Code of Conduct obligations apply to Albemarle only (ERA confirmation, Alison Ovenden, 17 March 2026). This obligation relates to supply restriction / debt recovery procedures and is event-triggered — it only applies if a restriction or debt recovery action is taken against the customer. Albemarle (Accounts 7064 and 7077) has no supply restrictions, no dunning/reminder notices, no debt recovery action, and no payment defaults recorded during the audit period (1 December 2022 – 30 November 2025). Confirmed from: BOB extract (37 invoices — all paid in full, Payments

No	Obligation under Condition	Findings
		Applied = Total on every invoice); Barred Customer Register (Albemarle not listed); client confirmation (A31).
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
139 (2018 & 2024)	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. *Clause 42*	NA — Not applicable to Albemarle Lithium (potable customer) in the audit period. Scope: All Code of Conduct obligations apply to Albemarle only (ERA confirmation, Alison Ovenden, 17 March 2026). This obligation relates to supply restriction / debt recovery procedures and is event-triggered — it only applies if a restriction or debt recovery action is taken against the customer. Albemarle (Accounts 7064 and 7077) has no supply restrictions, no dunning/reminder notices, no debt recovery action, and no payment defaults recorded during the audit period (1 December 2022 – 30 November 2025). Confirmed from: BOB extract (37 invoices — all paid in full, Payments Applied = Total on every invoice); Barred Customer Register (Albemarle not listed); client confirmation (A31).
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
142 (2018 & 2024)	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. *Clause 44(5)*	NA — Not applicable to Albemarle Lithium (potable customer) in the audit period. Scope: All Code of Conduct obligations apply to Albemarle only (ERA confirmation, Alison Ovenden, 17 March 2026). This obligation relates to supply restriction / debt recovery procedures and is event-triggered — it only applies if a restriction or debt recovery action is taken against the customer. Albemarle (Accounts 7064 and 7077) has no supply restrictions, no dunning/reminder notices, no debt recovery action, and no payment defaults recorded during the audit period (1 December 2022 – 30 November 2025). Confirmed from: BOB extract (37 invoices — all paid in full, Payments Applied = Total on every invoice); Barred Customer Register (Albemarle not listed); client confirmation (A31).
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
144 (2018 & 2024)	The licensee (other than the Water Corporation) must ensure that there is at least a 90% compliance rate with subclause 44(5) in any 12-month period ending on 30 June. *Clause 44(6)*	NA — Not applicable to Albemarle Lithium (potable customer) in the audit period. Scope: All Code of Conduct obligations apply to Albemarle only (ERA confirmation, Alison Ovenden, 17 March 2026). This obligation relates to supply restriction / debt recovery procedures and is event-triggered — it only applies if a restriction or debt recovery action is taken against the customer. Albemarle (Accounts 7064 and 7077) has no supply restrictions, no dunning/reminder notices, no debt recovery action, and no payment defaults recorded during the audit period (1 December 2022 – 30 November 2025). Confirmed from: BOB extract (37 invoices — all paid in full, Payments Applied = Total on every invoice); Barred Customer Register (Albemarle not listed); client confirmation (A31).
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
144A (2018 & 2024)	The licensee must give notice of a planned service interruption to each customer that will be affected by the service interruption. *Clause 46(1)*	NA — Not applicable to Albemarle Lithium in the audit period. Scope: All Code of Conduct obligations apply to Albemarle only (ERA confirmation, 17 March 2026). The 15 scheduled shutdowns recorded in the audit period relate to the RWS irrigation network — not to the potable water supply to Albemarle (Kemerton WTP). Albemarle's supply runs on a separate potable supply infrastructure. No planned service interruptions to Albemarle's potable supply were recorded during the audit period (confirmed A31; no Albemarle entries in shutdown registers). This obligation is therefore not triggered for Albemarle in the audit period.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
144B (2018 & 2024)	The notice of a planned service interruption must be given within the specified timeframes. *Clause 46(2)*	NA — Not applicable to Albemarle Lithium in the audit period. Scope: All Code of Conduct obligations apply to Albemarle only (ERA confirmation, 17 March 2026). The 15 scheduled shutdowns recorded in the audit period relate to the RWS irrigation network — not to the potable water supply to Albemarle

No	Obligation under Condition	Findings
		(Kemerton WTP). Albemarle's supply runs on a separate potable supply infrastructure. No planned service interruptions to Albemarle's potable supply were recorded during the audit period (confirmed A31; no Albemarle entries in shutdown registers). This obligation is therefore not triggered for Albemarle in the audit period.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
144C (2018 & 2024)	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. *Clause 47(1)*	COMPLIANT – A13 Procedure 02.19 provides comprehensive written policies, practices and procedures for dealing with and minimising the impact of service interruptions, meeting Clause 47(1) requirements under 2024 Code.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
144D (2018 & 2024)	The policies, practices and procedures under subclause 47(1) must deal with the specified matters. *Clause 47(2)*	COMPLIANT – A13 Procedure 02.19 deals with all prescribed matters under Clause 44(2) including notification timeframes, methods, affected customer identification, record-keeping and compliance reporting.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
144E (2018 & 2024)	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. *Clause 48*	NON-COMPLIANT — CONFIRMED. Obligation: The licensee must provide a 24-hour information line at local call cost (excluding mobile telephones) by means of which a customer can notify the licensee of emergencies and faults, and obtain information about the reason for, and the expected duration of, any unplanned service interruption (Clause 45 of the 2018 Code; Clause 48 of the 2024 Code). Finding: Harvey Water's only after-hours emergency contact is mobile 0439 192 324. A mobile number does not satisfy the 'local call cost excluding mobile telephones' requirement. This has been the case throughout the audit period (1 December 2022 to 30 November 2025) and across both the 2018 Code period (to 31 December 2024) and the 2024 Code period (from 1 January 2025). The same arrangement appears to have been in place before the audit period; obligation 144E was not separately tested in the prior (2022) operational audit and so this is a new finding in the current audit, not a recurrence of a prior recommendation. Controls assessment: The relevant controls — Procedure 02.19 (Interruption to Supply Notification), the Harvey Water and RWS

No	Obligation under Condition	Findings
		Customer Service Charters (s.1.1), and the supplier contact block on the back page of all customer invoices — each direct customers to mobile 0439 192 324 as the sole after-hours contact. None of these controls operates to publish a 24-hour information line at local-call cost, so the controls have been rated C (Inadequate). Evidence: A13 Procedure 02.19, A25 Harvey Water Customer Service Charter (September 2024) s.1.1, A25 RWS Customer Service Charter (October 2024) s.1.1, all 37 Albemarle invoice back pages — all reference mobile 0439 192 324 only. Reportable non-compliance: YES.
Priority 4	**Controls rating: C**	**Compliance rating: 2**

No	Obligation under Condition	Findings
145 (2018 & 2024)	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. *Clause 49(1)*	SCOPE (ERA 17 Mar 2026): Code of Conduct obligations apply to Albemarle Lithium (potable customer) only. RWS/irrigation member customers OUT OF SCOPE. COMPLIANT – A13 Procedure 02.16 provides a comprehensive written complaints procedure meeting Clause 46(1) requirements. Covers lodgement, acknowledgement, investigation, resolution, escalation and Ombudsman referral. Complaint register (A32) reviewed and confirmed with Harvey Water: no complaints were received from Albemarle Lithium in the audit period (1 December 2022 to 30 November 2025). Procedure-based assessment only.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
146 (2018 & 2024)	The licensee's complaints procedure must be developed using as minimum standards the relevant provisions of AS 10002:2022 and the ERA's guidelines (if any). *Clause 49(2)*	SCOPE (ERA 17 Mar 2026): Code of Conduct obligations apply to Albemarle Lithium (potable customer) only. RWS/irrigation member customers OUT OF SCOPE. COMPLIANT – A13 Procedure 02.16 developed using Water Services Code of Conduct 2024 Clause 49 and Ombudsman WA Complaint Handling Guidelines as minimum standards, consistent with Clause 46(2). Complaint register (A32) reviewed and confirmed with Harvey Water: no complaints were received from Albemarle Lithium in the audit period (1 December 2022 to 30 November 2025). Procedure-based assessment only.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
147 (2018 & 2024)	The licensee's complaints procedure must provide for the matters specified in relation to lodgement of complaints, acknowledging	SCOPE (ERA 17 Mar 2026): Code of Conduct obligations apply to Albemarle Lithium (potable customer) only. RWS/irrigation member customers

No	Obligation under Condition	Findings
	complaints, responding to complaints and dispute resolution arrangements. *Clause 49(3)*	OUT OF SCOPE. COMPLIANT – A13 Procedure 02.16 comprehensively covers all matters prescribed by Clause 46(3): lodgement methods, acknowledgement within 10 business days, resolution within 20 business days, written response, EWOWA escalation and Disputes Committee pathway. Complaint register (A32) reviewed and confirmed with Harvey Water: no complaints were received from Albemarle Lithium in the audit period (1 December 2022 to 30 November 2025).
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
148A (2018 & 2024)	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). *Clause 49(4)*	SCOPE (ERA 17 Mar 2026): Code of Conduct obligations apply to Albemarle Lithium (potable customer) only. RWS/irrigation member customers OUT OF SCOPE. COMPLIANT – A13 Procedure 02.16 s.4 lists available remedies including EWOWA (Freecall 1800 754 004) and Disputes Committee, consistent with Clause 49(4) under 2024 Code. Complaint register (A32) reviewed and confirmed with Harvey Water: no complaints were received from Albemarle Lithium in the audit period (1 December 2022 to 30 November 2025).
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
149 (2018 & 2024)	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. *Clause 49(5)*	SCOPE (ERA 17 Mar 2026): Code of Conduct obligations apply to Albemarle Lithium (potable customer) only. RWS/irrigation member customers OUT OF SCOPE. COMPLIANT – Complaints procedure publicly available on RWS website (verified 23 March 2026): https://rws.harveywater.com.au/customer-complaints.html. Accessible without login; downloadable form; footer-linked. All Cl. 49(5) and Code Cl. 3 'publicly available' requirements satisfied. Complaint register (A32) reviewed and confirmed with Harvey Water: no complaints were received from Albemarle Lithium in the audit period (1 December 2022 to 30 November 2025).
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
149A (2018 & 2024)	A licensee must inform the customer of the outcome of a complaint and, unless the customer has advised the licensee that the complaint has been resolved in a manner acceptable to the	SCOPE (ERA 17 Mar 2026): Code of Conduct obligations apply to Albemarle Lithium (potable customer) only. RWS/irrigation member customers OUT OF SCOPE. COMPLIANT – A13 Procedure 02.16 s.3.4d requires closing communication to

No	Obligation under Condition	Findings
	customer, provide information as specified in subclause 50(b). *Clause 50*	customer on resolution, including outcome and corrective measures, consistent with Clause 47. Complaint register (A32) reviewed and confirmed with Harvey Water: no complaints were received from Albemarle Lithium in the audit period (1 December 2022 to 30 November 2025). Procedure-based assessment only.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
150 (2018 & 2024)	The licensee must provide a customer with the specified services or documents on request and at no charge. *Clause 51(1)*	COMPLIANT — Client confirmed (A31): services and information available on HW website and by contacting the office at no charge. RWS pay-my-account page (rws.harveywater.com.au/pay-my-account.html) confirmed accessible (reviewed 16 March 2026). A25 Charter confirms no-charge services policy.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
152 (2018 & 2024)	The licensee must make available to each customer, on request and 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 within 5 business days after the request is made. *Clause 51(2) and (3)*	COMPLIANT — Client confirmed (A31): personal account information available on request to registered members/customers at no charge via customer portal (apps.harveywater.com.au/customer/) and by contacting the office. Policy_01.02 and Procedure_01.03 referenced. No Albemarle account information requests identified in audit period.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
153 (2018 & 2024)	The licensee must make the specified information publicly available. *Clause 52(1)*	COMPLIANT — the prescribed information required under Clause 52(1) (2024 Code) is publicly available on Harvey Water's website. The Customer Service Charter, fees and charges schedule, complaints procedure, and a link to the current Water Services Code of Conduct (Customer Service Standards) 2024 on the WA legislation website have all been verified as accessible. Evidence: Website review (April 2026) at www.harveywater.com.au and www.rws.harveywater.com.au.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
154 (2018 & 2024)	A licensee must ensure that the specified information about bills may be obtained from its website. *Clause 52(2)*	COMPLIANT — the specified bill information (including a link to the Code) can be obtained from Harvey Water's website as required under Clause 52(2) (2024 Code). Evidence: Website review (April 2026) confirms publication.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
154AA (2024)	A licensee must ensure that the specified information about Part 9 may be obtained from its website. *Clause 52(3)*	COMPLIANT — the specified information about Part 9 of the 2024 Code can be obtained from Harvey Water's website as required under Clause 52(3). Evidence: Website review (April 2026) confirms publication.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
154A (2018 & 2024)	The licensee must ensure that its website contains a link to the current version of this code appearing on the WA legislation website. *Clause 52(4)*	COMPLIANT —Harvey Water's website contains a hyperlink to the current version of the Water Services Code of Conduct (Customer Service Standards) 2024 on the WA legislation website (legislation.wa.gov.au) as required under Clause 52(4). Evidence: Website review (April 2026) confirms the legislation.wa.gov.au hyperlink is published.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

5.4 Other Licence Conditions

No	Obligation under Condition	Findings
155	The licensee must pay the applicable fees and charges in accordance with the applicable regulations. *Sec 12*	COMPLIANT. C9 (ERA Supplier Details) confirms all ERA fees and charges paid throughout the audit period (December 2022 – November 2025). Annual licence charges of $2,885 paid for 2023/24, 2024/25, and 2025/26 — all Closed status. Quarterly standing charges (licensing functions) paid throughout. No outstanding amounts. WSA s.12 / licence Cl.4.2.1 requirements satisfied.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
159	The licensee must comply with a direction from the ERA in relation to a breach of applicable legislation. *Sec 12*	NA — Obligation not triggered. No directions from the ERA in relation to breaches of applicable legislation were issued during the audit period (1 December 2022 to 30 November 2025). Confirmed by the licensee (A31) and by review of correspondence between Harvey Water and the ERA. As no activity took place during the audit period, this obligation has been assessed Not Rated (N/R) in accordance with the ERA's 2025 Audit and Review Guidelines.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
160	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. *Sec 12*	COMPLIANT - AASB compliant, Audit reviewed audited financial statement for the year ended 30 June 2023,2024 and 2025. No Significant audit issues noted.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
161	The licensee must comply with any individual performance standards specified by the ERA. *Sec 12*	COMPLIANT - All microbial and health-related chemical standards met Jan-Sep 2025. Aesthetic exceedances noted and disclosed.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
162	The licensee must cooperate with the independent expert and comply with the ERA's audit and review guidelines dealing with the operational audit. *Sec 12*	COMPLIANT — Harvey Water has cooperated fully with the independent expert (LAM) appointed to conduct the 2026 operational audit. Throughout the audit period, Harvey Water provided timely access to records, personnel and operational facilities. Key contacts (the Chief Financial Officer and the Contracts and Compliance Coordinator) participated in interviews and provided documentation as requested. Harvey Water complied with the ERA's 2025 Audit and Review Guidelines for Water Licences in providing documents and supporting the audit process. The

No	Obligation under Condition	Findings
		audit has been substantially completed by LAM in accordance with the approved Audit and Review Plan.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**
No	**Obligation under Condition**	**Findings**
163	The licensee must report to the ERA, in the manner specified, 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. *Sec 12*	COMPLIANT - No reportable changes. CEO and key personnel stable per Org Chart and Health Dept Reports
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**
No	**Obligation under Condition**	**Findings**
165	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. *Sec 12*	COMPLIANT - All compliance reports and annual performance datasheets submitted timely. A28 emails confirm: 2024/25 Annual Compliance Report submitted 30 July 2025 and acknowledged by ERA with no queries; 2024/25 Annual Performance Datasheets submitted and acknowledged by ERA. Post-2022 review implementation plan correspondence with ERA also on file.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**
No	**Obligation under Condition**	**Findings**
167	The licensee must provide the ERA with the data required for performance reporting purposes that is specified in the Water, Sewerage and Irrigation Licence Performance Reporting Handbook, and the National Performance Framework that apply to the licensee. *Sec 12*	COMPLIANT - Data reported per Framework
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**
No	**Obligation under Condition**	**Findings**
168	Subject to clause 2.8.3, the licensee must publish within the specified timeframe any information that the ERA has directed the licensee to publish under clause 2.8.1. *Sec 12*	NA — A31 Compliance Register (GAP: ok): No ERA direction was given to HW in the reporting period. Obligation not triggered.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**
No	**Obligation under Condition**	**Findings**
169	Unless otherwise specified, all notices must be in writing. *Sec 12*	NA — Client confirmed (A31): no specific ERA notice obligations under Licence Cl 3.7.1 were triggered during audit period. General written communications practices are in place per A25 Charters and A13 Procedures.

No	Obligation under Condition	Findings
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**
No	**Obligation under Condition**	**Findings**
170A	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. *Sec 12*	NA — A31 Compliance Register (GAP: ok): HW confirmed this did not occur in the reporting period. Obligation not triggered.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**
No	**Obligation under Condition**	**Findings**
171	The licensee must notify the ERA of any material change to the asset management system within 10 business days of the change. *Sec 12*	NA — A31 Compliance Register confirms this did not occur in the reporting period. Obligation not triggered.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**
No	**Obligation under Condition**	**Findings**
172	The licensee must cooperate with the independent expert and comply with the ERA's audit and review guidelines dealing with the asset management system review. *Sec 12*	COMPLIANT —Harvey Water has cooperated fully with the current ERA operational audit (Dec 2022–Nov 2025): A31 questionnaire responses provided, 70 documents supplied via project knowledge files, all information requests addressed. ERA Compliance Reports for 2022/23, 2023/24, and 2024/25 all submitted. No non-compliances reported.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**
No	**Obligation under Condition**	**Findings**
172A	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 to amend the standard term or condition of service, and to do so within a specified period. *Sec 12*	NA — Obligation not triggered. Client confirmed (A31): no ERA direction was issued regarding standard terms and conditions during audit period.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**
No	**Obligation under Condition**	**Findings**
172B	The licensee must comply with a direction given to the licensee under clause 6.1.1. *Sec 12*	NA — Obligation not triggered. Client confirmed (A31): no ERA direction under Cl 6.1.1 was issued during audit period, therefore Cl 6.1.2 compliance o
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**
No	**Obligation under Condition**	**Findings**
181	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	NA - Not applicable

No	Obligation under Condition	Findings
	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. *Sec 12*	
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
182	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. *Sec 12*	NA - Obligation not triggered. Client confirmed no service outside operating area.
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
184	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. *Sec 12*	COMPLIANT - MOU with DoH confirmed active per quarterly Health Dept Reports Jan-Sep 2025
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
185	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. *Sec 12*	COMPLIANT. MOU (swimco_harvey_doh_mou_text_jun2022.pdf, dated 23 June 2022) obtained from Harvey Water website (Kemerton WTP page) and reviewed. Sch2 Cl 7.1.4 requires the MOU to comply with specified requirements for: (a) legal standing, and (b) compliance audits by the Department of Health. Both requirements confirmed present: • Cl 16.1: MOU is legally binding ✓ • Cl 13: Full audit framework — DoH may require audit, approved auditor, audit report to Authority and published on website ✓ Evidence: MOU text, publicly available at harveywater.com.au (accessed 26 March 2026).
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
186	The licensee must comply with the terms of a Memorandum of Understanding. *Sec 12*	COMPLIANT. Harvey Water is complying with the terms of the MOU as evidenced by:

No	Obligation under Condition	Findings
		• A8 DoH quarterly water quality reports filed during audit period (Jan–Sep 2025) in the required format — satisfies MOU Cl 8.1 quarterly reporting obligation. • A10 WTP Sample Plan 2025-26 documents ongoing water quality monitoring programme consistent with MOU Cl 6.8. • MOU is current (signed 23 June 2022, 5-year term, expires 23 June 2027). • No DoH compliance action or notices identified during audit period. Evidence: MOU text; A8 DoH reports; A10 WTP Sample Plan.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
187	The licensee must publish in the form agreed with the Department of Health, a Memorandum of Understanding and any amendments to a Memorandum of Understanding within one month of signing or making the amendment. *Sec 12*	COMPLIANT. MOU published on Harvey Water website (Kemerton WTP page), confirmed accessible 26 March 2026. MOU signed 23 June 2022; Cl 16.3 requires publication within 1 month (by 23 July 2022). MOU is currently live. Exact original publication date cannot be verified from web access alone, but no evidence of delayed publication — consistent with timely compliance. MOU text and Schedules confirmed in published document. Evidence: Harvey Water website, Kemerton WTP page (accessed 26 March 2026); MOU PDF.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
188	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. *Sec 12*	COMPLIANT — DoH quarterly reports (Q3 2023 through Q4 2025) and annual water quality reports confirmed published on Harvey Water website (harveywater.com.au/kemerton-water-treatment-plant.html, reviewed 16 March 2026) with active download links. MOU audit report publication obligation met throughout audit period.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
189	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. *Sec 12*	COMPLIANT — Health reports (DoH quarterly reports Q3 2023 through Q4 2025 and annual water quality reports) confirmed published on Harvey Water website (reviewed 16 March 2026). Client confirmed (A31).
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings

No	Obligation under Condition	Findings
190 (2019)	The licensee must comply with the standards set out in Schedule 2 of the licence. *Sec 12*	COMPLIANT - All Schedule 2 health-related standards met Jan-Sep 2025 per Health Dept Reports
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
190A (2024)	The water service works provided by the licensee, for the purpose of water supply services, shall be designed, constructed, operated and maintained to provide continuity of pressure and flow for the services in accordance with the specified standards in Schedule 2. *Sec 12*	COMPLIANT - Continuous service maintained Jan-Sep 2025 per Health Dept Reports
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
190B (2024)	The licensee must notify: new customers upon purchase of the affected property as soon as practicable; and existing customers at least annually, if the pressure and flow of the water supplied to the customer's property falls outside of the pressure and flow range standards specified in Schedule 2 clause 1.1. *Sec 12*	NA - Not applicable during period
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
190C (2024)	The licensee must notify the ERA annually of any restrictions applied in accordance with the Water Services Regulations 2013 to a potable water supply, detailing restrictions by scheme, type (severity), duration, start date and number of services affected. *Sec 12*	NA - Not applicable during period
Priority 4	**Controls rating: N/P**	**Compliance rating: N/R**

No	Obligation under Condition	Findings
190E (2024)	The licensee must supply water that is suitable for irrigation purposes. *Sec 12*	COMPLIANT - Water quality confirmed suitable Jan-Sep 2025 per Health Dept Reports
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
190F (2024)	The licensee must provide at least 5 business days' notice to a customer of any planned service interruption. *Sec 12*	COMPLIANT — Sch2 Cl 5.1.2 requires at least 5 business days' notice for planned service interruptions only. 15 scheduled shutdowns recorded during the audit period. All 15 (100%) met the requirement; notice ranged from 5 to 12 days. Jobs 21077 (Aug 2023) and 22283 (May 2024) are classified as Emergency in the source

No	Obligation under Condition	Findings
		shutdown registers and are not subject to the planned interruption notice requirement under Sch2 Cl 5.1.2.
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

No	Obligation under Condition	Findings
190G (2024)	The licensee must comply with the irrigation service standards as specified in Schedule 2 of the licence. *Sec 12*	COMPLIANT - All irrigation service standards met Jan-Sep 2025 per Health Dept Reports
Priority 4	**Controls rating: N/P**	**Compliance rating: 1**

6. Status of recommendations addressing non-compliances from the previous audit

The status of the recommendation from the previous (2022) operational audit is set out below in the format prescribed by the ERA's 2025 Audit and Review Guidelines for Water Licences (Table 3).

A. Resolved during current audit period

Recommendation reference (no./year)	Non-compliance / Control deficiency (Rating / Licence obligation / Details)	Auditor's recommendation	Date resolved & further action required
01/2022	Minor non-compliance (62) Water Services Act 2012 – Section 210(5) 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 specified information. The 2022 audit identified that Harvey Water's procedure manual did not include reference to the designation of an inspector or compliance officer.	Harvey Water should update its procedure manual to include reference to the designation of an inspector or compliance officer (if and when one is appointed) and the issuing of a certificate of authority in accordance with Section 210(5) of the Water Services Act 2012.	Resolved. During the current audit period, Harvey Water has continued not to appoint an inspector or compliance officer (as it is not required to do so). The current audit has assessed Section 210(5) as Not Applicable (N/A) on the basis that no such designation has been made. No further action required.

B. Unresolved at end of current audit period

Nil. The recommendation from the 2022 operational audit has been resolved as set out above.

Appendix A – Audit Plan

Refer to Approved audit plan and review (see attached the approved audit plan)

Appendix B – References

Key references used in this audit:

Harvey Water personnel interviewed:

- Chief Financial Officer, Harvey Water
- Contracts and Compliance Coordinator, Harvey Water

Audit team:

- Joey Fu – Lead Auditor (Operational Audit)
- Daniel Rivera – Lead Auditor (Asset Management System Review)

Key documents reviewed:

- Water Services Operating Licence WL31 (Version 12, 13 June 2022)
- Map of Licence Operating Area
- 2022 Operational Audit and Asset Management System Review (final report)
- Annual Compliance Reports (2022-23, 2023-24, 2024-25)
- Annual Performance Reports (2022-23, 2023-24, 2024-25)
- South-West Irrigation Cooperative Limited – Annual Reports (2022-23, 2023-24, 2024-25)
- South-West Irrigation Management Cooperative Limited – Annual Reports (2022-23, 2023-24, 2024-25)
- South-West Irrigation Management Cooperative Limited – Organisation Chart 2025
- Harvey Water Procedure Manual 2025 (including Procedure 02.01 Asset Management Policy and Procedure 02.19 Interruption to Supply Notification)
- Asset Management Plan 2024-25 (Version 2 Final for Issue)
- PKF Integrity Services Internal Audit Report – Asset Management (6 February 2025)
- Memorandum of Understanding between SWIMCO/Harvey Water and Department of Health (June 2022)
- Quarterly reports to Department of Health for 2025
- Makwater Water Treatment Plant Service Report and Sampling Plan (1/12/2025)
- Makwater Operation Manuals for Reverse Osmosis and Potable Water Treatment Plant
- Water Services Procedures Manual
- Emergency Management Plan
- Senior Management Job Descriptions
- Annual Staff Training Matrix (2022-23, 2023-24, 2024-25)
- Strategic Plan (2022-23, 2023-24, 2024-25)
- Operations Budget (2022-23, 2023-24, 2024-25) and Five-year Operations and CAPEX budgets
- Financial Plan 2025/26
- Customer Service Charter (Harvey Water, September 2024) and RWS Customer Service Charter (October 2024)
- Policy Statement Manual
- Land development procedures manual
- Operations and planning work instruction manual
- Financial Hardship Policy
- Record Retention Policy
- Compliance and Reporting Register
- Complaints Register
- EWOWA Membership Invoices (INV-1588 and INV-1606)
- Albemarle Lithium Industrial Water Supply Agreement (IWSA) and supporting invoice samples
- Caveat Register 2022 onwards
- Compliance Notice (29 August 2024) and supporting Traffic Management Plans (Government Road Wokalup CB-2024-12 and Coronation Road)
- Notice of Entry / Release of Restoration template

• ERA Supplier Details (exported 30/03/2026) and ERA fee payment evidence
• Minutes of Harvey Water Board meetings (1/7/2025 to date)
• Relevant correspondence between the Licensee and the ERA
    - Water Services Act 2012 (WA)
    - Water Services Regulations 2013 (WA)
    - Water Services Code of Conduct (Customer Service Standards) 2018
    - Water Services Code of Conduct (Customer Service Standards) 2024
    - Water Services Code of Practice (Family Violence) 2020
    - Water Services Licence WL31
    - 2025 Audit and Review Guidelines for Water Licences (ERA, 2025)
    - Water Compliance Reporting Manual (ERA)
    - Australian Standard on Assurance Engagements ASAE 3100 Compliance Engagements