



**NSW
Resources
Regulator**

COMPLIANCE AUDIT REPORT

MOUNT OWEN COMPLEX – TOPSOIL MANAGEMENT

Mount Owen Pty Ltd

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Contents

Introduction	4
Background	4
Audit objective	4
Audit scope.....	5
Audit criteria	5
Publishing and disclosure of information	5
Audit methods	6
Opening meeting.....	6
Site interviews and inspections	6
Data collection and verification	6
Site inspections.....	6
Closing meeting.....	7
Compliance assessment definitions.....	7
Reporting.....	9
Audit findings.....	10
Topsoil stripping operations	10
Glendell operations	10
Mount Owen operations	11
Direct placement of topsoil	11
Topsoil stockpiling operations	12
Topsoil stockpiling.....	12
Inspection and maintenance of stockpiles.....	16
Reuse of stockpiled topsoil	17
Record keeping	17
Titleholder response to draft audit findings	18
Audit conclusions.....	19

Introduction

Background

A condition of all mining leases issued under the *Mining Act 1992* requires that any disturbance resulting from the activities carried out under the lease must be rehabilitated to the satisfaction of the Minister. Management of topsoil and any cleared vegetation including mulch, is a key component for successful rehabilitation.

Topsoil must be stripped and salvaged in an appropriate manner to maximise its value for use in rehabilitation. Only the upper soil layer is usually biologically active and of value in rehabilitation activities. The lease holder must understand the soils on the site to ensure that sufficient topsoil can be stripped to provide a suitable growth medium in the rehabilitation phases. It is generally considered best practice for stripped topsoil to be directly respread on rehabilitation areas where land shaping has taken place and the area is ready for final rehabilitation.

Where mining operations have not progressed to the stage of having areas available for topsoil to be directly respread, stockpiling of stripped topsoil may be necessary. Poor handling and stockpiling practices may result in a significant loss of viable seed and topsoil quality. Management and maintenance of these stockpiles is essential to prevent erosion and weed infestation and to retain maximum soil reserves for use during rehabilitation works.

The Mount Owen Complex comprises the mining operations of Mount Owen, Glendell and the former Ravensworth East mine. Mount Owen Pty Ltd (Mount Owen) manages the complex on behalf of Glencore Coal Australia Pty Ltd (Glencore). Thiess operates the Mount Owen mine under a contractual agreement with Mount Owen. Glencore is the operator for the Glendell and Ravensworth East operations.

As part of the compliance audit program, an audit of the topsoil management activities associated with the mining operations at the Mount Owen Complex was undertaken on 6 June 2019.

Audit objective

The objective of the audit was to assess the operational performance of Mount Owen Complex, in relation to the management of topsoil and the ability of the lease holder to implement management systems and controls to provide for the sustainable management of the mine's topsoil resources.

Audit scope

The scope of the audit included:

- the topsoil management activities across the Mount Owen Complex as described in the approved mining operations plan (MOP) and associated management plans
- a review of documents and records pertaining to the topsoil management activities
- the assessment of compliance for the period commencing 6 June 2018 and ending 6 June 2019.

Audit criteria

The audit criteria against which compliance was assessed included:

- commitments made in Mount Owen Complex mining operations plan – 1 September 2018 to 31 December 2019, Version Final 1.0 dated November 2018
- commitments made in the GLD Land Clearing and Topsoil Stripping Procedure, Document No. MGOOC-1779562647-1844, Version 8 dated 29 January 2019, prepared by Glencore
- commitments made in the Mount Owen Managing Land Disturbance Procedure, Version 2 dated 9 January 2018, prepared by Thiess.

Publishing and disclosure of information

This audit report will be published on the NSW Resources Regulator's website consistent with Section 365 of the *Mining Act 1992*.

This audit report may be publicly disclosed consistent with the *Government Information (Public Access) Act 2009*.

Audit methods

The audit process involved interview of site personnel and a review of documentation and samples of records provided by the lease holder. A site inspection was undertaken to determine the level of compliance of the operations and assess its operational performance. The audit process and methodology are described in more detail in the sections below.

Opening meeting

The opening meeting was held at the Glendell mine office on 6 June 2019. The audit team was introduced, and the scope of their responsibilities was conveyed to the auditees to outline the objectives and scope of the audit. The methods used by the team to conduct the audit were explained including interviewing personnel, reviewing documentation, examining records and conducting a site inspection to assess specific compliance requirements.

Site interviews and inspections

Data collection and verification

Where possible, documents and data collected during the audit process were reviewed on site. Several documents were unable to be reviewed on site and were provided following the site visit.

All information obtained during the audit process was verified by the audit team where possible. For example, statements made by site personnel were verified by viewing documentation and/or site inspections where possible. Where suitable verification could not be provided, this has been identified in the audit findings as not determined.

Site inspections

A site inspection was undertaken of the following areas:

Glendell

- topsoil stockpile 9 – paddock dumped, weed infestations, some large rocks
- topsoil stockpile 11 – recently established, ripped and seeded
- topsoil stockpile 1 – seeded, some vegetation

- direct placement of topsoil at Bayswater North – some weed establishment and rilling
- topsoil stockpile 19 – removal of topsoil in progress

Mount Owen

- Mount Owen topsoil stockpile 2 – well vegetated, weed control applied
- Mount Owen topsoil stockpile 5 – well vegetated, some weeds but weed control previously applied
- Mount Owen topsoil stockpile 14 – recently established, includes mulch
- vegetation clearance and topsoil stripping area at Mount Owen.

Closing meeting

The closing meeting was held at the Glendell mine office on 6 June 2019. The objectives of this meeting were to discuss any outstanding matters, present preliminary findings and outline the process for finalising the audit report.

Compliance assessment definitions

The reporting of results from the compliance audit was determined based on the definitions presented below in Table 1.

Table 1 Audit assessment categories

ASSESSMENT	CRITERIA
Compliance	Sufficient and appropriate evidence is available to demonstrate the particular requirement has been complied with.
Non-compliance	<p>Clear evidence has been collected to demonstrate the particular requirement has not been complied with. There are three subcategories of non-compliance reflecting the severity and level of risk associated with the non-compliance:</p> <p>NC1 – the absence of planning or implementation of a required operational element that has the potential to result in a significant risk</p> <p>NC2 – an isolated lapse or absence of control in the implementation of an operational element that is unlikely to result in a significant risk</p>

ASSESSMENT	CRITERIA
	<p>NC3 – an administrative or reporting non-compliance that does not have a direct environmental or safety significance</p> <p>Note: The identification of a non-compliance in this audit may or may not constitute a breach of the <i>Mining Act 1992</i>. Non-compliances identified in this audit report may be further investigated by the NSW Resources Regulator</p>
<p>Observation of concern</p>	<p>Where an auditee may be compliant at the time of the audit but there are issues that exist that could result in the potential for future non-compliance if not addressed.</p> <p>Observation of concern was also used where an issue may not have particular compliance requirements, but which was not conducive to good management or best practice.</p>
<p>Suggestion for improvement</p>	<p>Where changes in processes or activities inspected or evaluated at the time of the audit could deliver improvement in relation to risk minimisation, sustainable outcomes and management practices.</p>
<p>Not determined</p>	<p>The necessary evidence has not been collected to enable an assessment of compliance to be made within the scope of the audit.</p> <p>Reasons why the audit team could not collect the required information include:</p> <ul style="list-style-type: none"> ■ insufficient information on the file relating to the period covered by the audit or insufficient evidence collected to reach a conclusion ■ the wording on the criteria (approval condition) meant that no evidence could be gathered, or it was too difficult to gather the evidence. <p>A ‘not determined’ assessment was also made where the condition was outside of the scope of the audit.</p>
<p>Not applicable</p>	<p>The circumstances of the authorisation or titleholder have changed and are no longer relevant, e.g. no longer mining, mining equipment and plant has been removed, etc.</p> <p>An invoking element in the criteria was not activated within the scope of the audit.</p>

Reporting

Following completion of the site audit, the audit checklists were completed, and audit notes were reviewed to compile a list of outstanding matters to be noted in the audit report. This report was prepared to provide an overview of the operational performance of the site in relation to the management of topsoil and identify any non-compliances or observations of concern noted by the auditors during the site inspections and interviews.

The draft audit findings were forwarded to Mount Owen for comment. Consideration was given to the representations made during the finalisation of the audit report as discussed in the audit findings.

Audit findings

Topsoil stripping operations

Section 2.2.3 of the approved MOP states that land preparation will be undertaken in accordance with the site clearing and topsoil stripping procedures. Before any site clearing disturbance, the Mount Owen environment and community department must first approve a ground disturbance permit (GDP). This permit

- defines the clearing limits
- details any required erosion and sediment controls
- includes details on any habitat features that should be salvaged for future rehabilitation.

In relation to topsoil stripping, the MOP states *'Topsoil stripping closely follows the clearing operations, and if vegetation has been mulched, the mulch is incorporated into the topsoil during the stripping operations. Topsoil stripping is closely monitored to ensure that only the top layer of topsoil or suitable subsoils is taken (nominally 100mm to 150mm).'*

Glendell operations

The Glendell operations are managed by Glencore. An example of a GDP (dated 15 May 2018) for the stripping of strip 19 in preparation for mining was reviewed by the auditors. It was noted that the permit clearly identified the clearing limits and identified the location and maximum height of the topsoil stockpiles to be established. In the case of strip 19, specific erosion and sediment controls were not required but it was noted on the GDP that sediment dam 12 constructed in 2017 was the nominated control for the stripping activity. A specific permit condition listed in section 8 of the GDP identified a large ironbark to be maintained for use in rehabilitation as habitat. Based on the evidence reviewed, the GDP process was assessed as being consistent with the description in the MOP.

No stripping operations were in progress at the time of the audit, therefore several of the topsoil stripping procedures described in section 5.2.2 of the *GLD Land Clearing and Topsoil Stripping Procedure* could not be verified. For example, it was not possible to confirm that:

- a scraper was used to strip and transport topsoil
- topsoil stripping would generally be limited to 100 metres in advance of mining
- topsoil would only be taken where it was free of weed infestations.

Observation of recently established topsoil stockpiles showed the presence of mulch that would infer that where mulching has occurred, the topsoil was removed incorporating the mulch into the topsoil, as specified in the procedure. The incorporation of mulch into the topsoil was assessed as being consistent with the description in the MOP.

Mount Owen operations

The Mount Owen operations are managed under contract by Thiess. Thiess has established procedures for topsoil stripping as follows:

- Mount Owen Managing Land Disturbance Procedure, version 2 dated 9 January 2018
- Mount Owen Topsoil Management Procedure, version 2 dated 9 January 2018

Clearing operations in advance of topsoil stripping were in progress at C10E at the time of the audit. The Thiess environmental adviser was able to demonstrate that a GDP was open in relation to the clearing and stripping operation. Observations made during an inspection of the works in progress confirmed that:

- clearing and stripping areas had been delineated
- salvage of habitat features was in progress
- appropriate signs were in place
- the area being stripped was generally not more than one mining block in front of the mine plan.

These observations confirm that clearing and topsoil stripping was generally being conducted in accordance with the Thiess procedures. It was noted that the Thiess topsoil management procedure required the completion of an inspection and test plan (ITP) for topsoil stripping operations. An example of a completed ITP for a previous strip was reviewed as evidence of the implementation of the ITP process. No issues of concern were identified.

Direct placement of topsoil

An example of direct placement of topsoil was inspected in the Bayswater North area. Topsoil was observed to have been generally spread at the nominated depth. Section 5.2.4 of the *GLD Land Clearing and Topsoil Stripping Procedure* states that topsoil is to be spread across the slope to eliminate the chance of topsoil being lost in rain conditions.

However, some minor rilling was observed (Figure 1). The Glencore Environment and Community Manager advised that while the topsoil had been placed, it had not been ripped at the time of inspection. The minor rilling was the result of some light rain. It is acknowledged that the minor rilling will be addressed once the topsoil is ripped along the contour, however it is of concern that the topsoil had not been ripped and seeded at the time of placement. This was raised as **observation of concern no. 1**.

Figure 1 Topsoil placement at Bayswater North showing minor rilling



Topsoil stockpiling operations

Topsoil stockpiling

In relation to topsoil stockpiling, the MOP states that *'where direct placement is not possible, the stripped soil will be stockpiled for future use in accordance with stripping and stockpiling procedures.'* Topsoil stockpiles at both the Glendell operations and the Mount Owen operations were inspected during the audit and assessed against their respective procedures.

Glendell

The requirements of section 5.2.2 of the Glencore topsoil stripping procedure and the corresponding observations made during the audit site inspection are summarised in Table 2.

Table 2 Requirements and observations of stockpiling activities at Glendell

REQUIREMENT	OBSERVATION
Topsoil will be stockpiled away from mining traffic and watercourses	The topsoil stockpiles inspected during the audit were all located away from mining traffic and watercourses.
Identification of stockpile sites will be identified as part of the pre-task risk assessment and ground disturbance permit	The GDP for the strip 19 area was noted to include a map showing the location of the topsoil stockpiles. It was noted that a maximum height of two metres was also specified in the GDP.
Where possible, stockpiles are to be generally less than three metres in height.	Generally, the topsoil stockpiles inspected during the audit were less than three metres in height, with many being less than two metres (Figure 2).
The stockpiles are to be set out in windrows to maximise surface exposure and biological activity	Some of the stockpiles inspected had been set out in windrows (e.g. Glendell stockpile 11 and stockpile 1). Other large stockpiles had generally been shaped into low mounds, particularly where the stockpiles were to be left in place for long periods (e.g. Glendell stockpile 19) (Figure 3).
Stockpiles that will not be used for longer than three months will be shaped, fertilised and revegetated with a cover crop.	Good vegetation establishment had been achieved on most of the stockpiles inspected where the stockpiles were to remain in place for longer than three months. However, stockpile 9 was observed to be paddock dumped, not shaped and did not appear to have been fertilised and seeded. – weed infestations were evident (Figure 4).
All topsoil stockpiles are to be signposted.	All the stockpiles inspected were signposted as topsoil stockpiles with an identifying number (Figure 5).

Figure 2 Stockpile 11 showing height less than three metres



Figure 4 Stockpile 9, paddock dumped and weed infested



Figure 3 Stockpile 19 mounded formation



Figure 5 Typical topsoil stockpile signage



Mount Owen

The requirements of section 4 of the Thiess topsoil management procedure and the corresponding observations made during the audit site inspection are summarised in Table 3.

Table 3 Requirements and observations from stockpiling activities at Mount Owen

REQUIREMENT	OBSERVATION
Set out stockpiles in windrows to maximise surface exposure and biological activity.	Only one of the Mount Owen stockpiles inspected was observed to have been windrowed (stockpile 14). Stockpiles 2 and 5 were both extensive low mounds. However, it is acknowledged that stockpiles 2 and 5 were most likely established before the topsoil management procedure was implemented.
Select level or gently sloping areas as stockpile sites to minimise erosion. If possible, stockpiles should be oriented lengthwise to the NE/SE direction to minimise the risk of erosion from prevailing winds,	Generally, the stockpiles inspected were all on level or gently sloping areas.
Install appropriate sediment controls at the base of stockpiles as required.	Sediment controls were not observed at either of the long-term stockpile sites where vegetation was established, but the risk of erosion was low.
Loosely place stockpiles to a maximum depth of three metres. The optimum depth is one metre and effort shall be made to minimise the stockpile depth.	The stockpiles inspected were all below three metres in height and mostly below two metres in height. Recently established piles were observed to be loosely placed (e.g. stockpile 14 – Figure 6), but the older stockpiles were more compacted.
Where the stockpile is to be in place for longer than three months, rip and sow with a suitable non-invasive cover crop.	The two older stockpiles inspected (stockpiles 2 and 5) were observed to have reasonable vegetation established (Figure 7).

Figure 6 Loosely placed topsoil and mulch in stockpile 14



Figure 7 Vegetation establishment on stockpile 2



Inspection and maintenance of stockpiles

The Glendell topsoil management procedure, referenced in the approved MOP, identifies in section 5.2.2 that regular inspections will be conducted for weed and erosion control. The Glencore environmental manager advised that an inspection program for the topsoil stockpiles had not been implemented. Some opportunistic inspections were carried out when near topsoil stockpiles for other activities, but these were not documented. This is raised as **non-compliance no. 1**. The weed infestations at stockpile 9 in particular may have been identified and addressed earlier had an inspection program been implemented.

Where issues of concern are identified during informal inspections of stockpiles at Glendell, they are logged in to the compliance management system CMO. This system has the ability to assign actions, report outstanding actions, escalate actions when required and close out issues once completed.

The Thiess topsoil management procedure includes a requirement to monitor weed growth on stockpiled soils. The Thiess environmental officer provided examples of the monthly environmental inspection reports (which include inspection of topsoil stockpiles in the rehabilitation section) to demonstrate that a monitoring program for topsoil stockpiles had been implemented at Mount Owen. Records of weed spraying activities were provided to demonstrate that weed management is undertaken when weed issues are identified.

Thiess uses the Synergy software system to record and track actions. Interview with the Thiess environmental officer found that where actions were completed immediately, this was recorded on the inspection checklist and not logged into Synergy. Where actions cannot be completed immediately, then the issues were logged into Synergy and tracked through to completion. It was noted that the Synergy

job numbers were not recorded on the inspection checklists. As **suggestion for improvement no. 1**, it is suggested that Thiess considers recording the Synergy job number on the inspection checklist as a cross reference.

Reuse of stockpiled topsoil

Tables 21 and 25 of the approved MOP identify requirements for topsoil to be tested to assess the suitability for post mining land uses. It was observed that topsoil was in the process of being recovered from Glendell stockpile 19 (Figure 8). However, the Glendell environmental manager could not provide evidence that testing of topsoil had been undertaken before respreading and confirmed that a testing program has not been implemented for the Glendell operations. This is raised as **non-compliance no. 2**.

Figure 8 Topsoil recovery from stockpile 19



For the Mount Owen operations, the Thiess environmental manager provided examples of soil analysis results from NATA accredited testing laboratory ALS to verify implementation of a testing program.

Record keeping

Section 5.2.2 of the Glendell topsoil management procedure requires the details of the origin of material, stripping depth etc to be recorded and added to the site GIS database. It was observed that Glencore maintained a topsoil resources register using an Excel spreadsheet. For each stockpile across the Mount Owen complex, the volume of topsoil in each stockpile was recorded, including the year it was stockpiled. The source of the topsoil in each stockpile was recorded along with details on the condition or quality of the topsoil. The topsoil resources register was observed to be linked to the site GIS database.

Thiess has implemented a similar system and provides data to Glencore for updating of the site topsoil resources register.

Titleholder response to draft audit findings

Mount Owen was provided with a copy of the draft audit report and invited to submit a response to the draft audit findings. A copy of the response is provided in Appendix 1.

Mount Owen generally accepted the audit findings. In relation to the direct placement of topsoil at Bayswater North (Figure 1), Mount Owen advised that the topsoil had been placed but not yet ripped, so the light rilling was a result of some light rain before the inspection and not a result of land preparation. The auditors accept that the topsoil had not yet been ripped and that ripping would address the minor rilling observed. However, it is of concern that there was a delay between placing topsoil and the ripping and seeding of the area. Therefore, the observation of concern remains.

Audit conclusions

From the evidence reviewed during the audit and observations made on site during the audit site inspections, it is concluded that Mount Owen has established procedures and processes for the stripping, handling, and management of topsoil from its mining operations. Generally, implementation of these procedures was shown to be effective in managing the risks associated with the management of topsoil resources on the site. Issues of concern in relation to inspection and maintenance of stockpiles were identified.

Two non-compliances, one observation of concern and one suggestion for improvement were noted by the auditor as summarised in Table 4, Table 5 and Table 6 below.

Table 4 Summary of non-compliances identified

NON-COMPLIANCE NO.	DESCRIPTION OF ISSUE	RECOMMENDATION
1	The Glendell topsoil management procedure, referenced in the approved MOP, identifies in section 5.2.2 that regular inspections will be conducted for weed and erosion control. The Glencore environmental manager advised that an inspection program for the topsoil stockpiles had not been implemented. Some opportunistic inspections are carried out when near topsoil stockpiles for other activities, but these are not documented.	Develop and implement a risk-based inspection program for topsoil stockpiles.
2	Tables 21 and 25 of the approved MOP identify requirements for topsoil to be tested to assess the suitability for post mining land uses. It was observed that topsoil was in the process of being recovered from Glendell stockpile 19. However, the Glendell environmental manager could not provide evidence that testing of topsoil had been undertaken before respreading and confirmed that a testing program has not been implemented for the Glendell operations.	Develop and implement a testing program for topsoil as outlined in the MOP.

Table 5 Summary of observations of concern identified

OBSERVATION OF CONCERN NO.	DESCRIPTION OF ISSUE	RECOMMENDATION
1	Section 5.2.4 of the GLD Land Clearing and Topsoil Stripping Procedure states that topsoil is to be spread across the slope to eliminate the chance of topsoil being lost in rain conditions. However, topsoil appeared to have been ripped perpendicular to the contour and as a result some minor rilling had developed.	Remediate rilling and review topsoil resspreading procedures.

Table 6 Summary of suggestions for improvement identified

SUGGESTION FOR IMPROVEMENT NO.	DESCRIPTION OF ISSUE
1	Thiess uses the Synergy software system to record and track actions. Interview with the Thiess environmental officer found that where actions were completed immediately, this was recorded on the inspection checklist and not logged into Synergy. Where actions cannot be completed immediately, then the issues were logged into Synergy and tracked through to completion. It was noted that the Synergy job numbers were not recorded on the inspection checklists. It is suggested that Thiess consider recording the Synergy job number on the inspection checklist as a cross reference.



DOC19/640113

Mr Ned Stephenson
Environment & Community Manager
Mount Owen/Glendell Operations
By email: ned.stephenson@glencore.com.au

Dear Mr Stephenson

Subject: Compliance Audit – Mount Owen Pty Ltd

An audit of the topsoil management activities associated with the Mount Owen Complex was undertaken on 6 June 2019 as part of the compliance audit program undertaken by the Department of Planning, Industry & Environment (DPIE) – Resources Regulator (the Regulator).

We now offer you the opportunity to review the draft compliance audit report and submit any comments you may have regarding the content of the report to Jenny Ehmsen by 9 August 2019 so that they may be considered in finalising the report. We further advise that any comments provided by you will be attached to the final report as an Appendix. If, however, we have not received a response by the above date, we will assume that you are satisfied with the report and it will then be finalised. A copy of the final report will then be forwarded to you.

You should note that the Regulator will be publishing the final audit report on its website, which will include any response you provide to the draft audit report.

If you require further information or clarification on any matters regarding this audit, please do not hesitate to contact Jenny Ehmsen on 02 4063 6443.

Yours sincerely

A handwritten signature in black ink that reads 'Jenny Ehmsen'.

Jenny Ehmsen
Principal Compliance Auditor

29 July 2019

From: Ned.Stephenson@glencore.com.au
To: [Jenny Ehmsen](mailto:Jenny.Ehmsen@planning.nsw.gov.au)
Cc: [Neil Mcelhinney](mailto:Neil.Mcelhinney@planning.nsw.gov.au); [Monique Meyer](mailto:Monique.Meyer@planning.nsw.gov.au); Jason.Desmond@glencore.com.au; Ashley.McLeod@glencore.com.au; Nigel.Charnock@glencore.com.au; Paul.Amidy@glencore.com.au
Subject: RE: Compliance audit: Topsoil management
Date: Tuesday, 30 July 2019 12:30:58 PM
Attachments: [image001.jpg](#)
[image002.jpg](#)
[Letter_draft_audit_report_Mount_Owen_Topsoil_management.pdf](#)
[Draft Audit Report Mount Owen Topsoil.pdf](#)

Dear Jenny,

Thank you for the opportunity to review the Topsoil Audit report before finalisation.

Can I please ask for the following amendment to Figure 1 (pg 12) and Observation of Concern no.1.

The topsoil inspected at Bayswater north in this photo had been placed, but not yet ripped. So the minor rilling was a result of light rain, sometime before the inspection, and not from land preparation. If you require, we can verify this methodology via the rehabilitation contract in place as well as Lidar.

Otherwise MGO agree with the other findings in the report.

Regards

Ned Stephenson
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From: Jenny Ehmsen <jenny.ehmsen@planning.nsw.gov.au>
Sent: Monday, 29 July 2019 9:05 AM
To: Stephenson, Ned E (Glendell - AU) <Ned.Stephenson@glencore.com.au>
Cc: Neil Mcelhinney <neil.mcelhinney@planning.nsw.gov.au>; Monique Meyer <monique.meyer@planning.nsw.gov.au>
Subject: Compliance audit: Topsoil management

External sender

Good morning Ned

Please find attached a covering letter and a copy of the draft audit report for your review and comment.

Regards

Jenny

Jenny Ehmsen
Principal Compliance Auditor

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