

**Alliance for Water Stewardship - Site Level Audit Report**

<b>Client Name:</b>	Ingham's Enterprises Pty Limited
<b>Audit date(s):</b>	Wednesday 14 <sup>th</sup> and Thursday 15 <sup>th</sup> November 2017
<b>Audit location:</b>	Grant Road, Somerville VIC
<b>Audit report completed by:</b>	Kevin OGrady
<b>Report issue date:</b>	Friday 16 <sup>th</sup> November 2017
<b>Proposed date of next audit:</b>	October 2019

**Introduction to the Alliance for Water Stewardship**

The AWS Standard ("the Standard") is intended to drive water stewardship, which is defined as *the use of water that is socially equitable, environmentally sustainable and economically beneficial, achieved through a stakeholder-inclusive process that involves site- and catchment-based actions*. Good water stewards understand their own water use, catchment context and shared concerns in terms of water governance, water balance, water quality and Important Water-Related Areas, and then engage in meaningful individual and collective actions that benefit people and nature.

The Standard outlines a series of actions, criteria and indicators for how one should manage water at the site level and how water management should be stewarded beyond the boundaries of a site. In this Standard, the "site" refers to the implementing entity that is responsible for fulfilling the criteria. The site includes the facility and the property over which the implementer that is using or managing water (i.e., withdrawing, consuming, diverting, managing, treating and/or discharging water or effluent into the environment) has control.

**Disclaimer**

The BM TRADA audit was based on a sampling approach and therefore nonconformities may exist which have not been identified.

A copy of this report shall be distributed to the certified client and to BM TRADA.

The ownership of this audit report is maintained by BM TRADA.

BM TRADA shall keep confidential all information relating to the audit and your organisation and shall not disclose such information to any third party except as required by law or by Accreditation Bodies.

BM TRADA assumes no responsibility (legal or otherwise) or accepts no liability to any person(s) for any loss, damage or expense caused by reliance on information provided in this audit report.

**Guidance on BM TRADA nonconformities issued against the AWS standard requirements**

Details of all nonconformities issued at the audit are contained in separate nonconformity reports and should have been presented to you at the closing meeting.

Please send all nonconformity responses to your local BM TRADA office. Once we have received responses they will be forwarded to your auditor for review. We will contact you if further submission is required.

Audit finding shall be assigned (or 'graded') into one of three categories: major non-conformity, minor non-conformity, and observation.

**Major Non-Conformities**

A major non-conformity is raised if:

The issue represents a systematic problem of substantial consequence;

The issue is a known and recurring problem that the client has failed to resolve;

The issue fundamentally undermines the intent of the AWS Standard; or

The nature of the problem may jeopardize the credibility of AWS.

**Minor Non-Conformities**

Where the audit team has evaluated an audit finding and determines that the seriousness of the issue does not meet the any of the criteria for Major non-compliance the audit team shall grade the finding as a minor non-conformity.

**AWS NCR Scheme Rules**

NCR Type	Major
<p><b>Timescale for closure</b></p>	<p><b>Applicants:</b> Major NCR must be closed* within Ninety (90) days of the NCR issue date. Failure to meet this deadline will require another conformity assessment.</p> <p><b>Certificate Holders:</b> Major NCR must be closed* within Thirty (30) days of the NCR issue date. If the Major NCR is not addressed within 30 days BM TRADA shall suspend or withdraw the certificate and reinstatement shall not occur before another conformity assessment has been successfully completed.</p> <p>* closed = actioned by the client, corrections &amp; corrective actions verified and closed by the auditor.</p>

NCR Type	Minor

<b>Timescale for closure</b>	<p><b>Applicants:</b> The audit team may recommend the client for certification once the client has submitted an acceptable corrective action plan to address all minor non-conformities.</p> <p>The corrective action plan shall include:</p> <ul style="list-style-type: none"> <li>• an analysis of the root cause of the minor non-conformity;</li> <li>• the specific corrective action(s) to address the minor non-conformity; and</li> <li>• an appropriate time frame to implement corrective action(s).</li> </ul> <p><b>Certificate Holders:</b> Minor NCR must be closed* within Ninety (90) days of the NCR issue date. BM TRADA may agree to an alternative time frame with the client as long as this can be justified and is documented in the NCR report.</p> <p>If corrective actions are inadequate to resolve a minor non-conformity by the time of the next scheduled audit, the CAB shall upgrade the audit finding to a major non-conformity.</p> <p>If an unusually large number of minor non-conformities are detected during the course of a single audit, the audit team may at their discretion raise a major non-conformity to reflect a systematic failure of the client's management system to deliver conformity with the AWS Standard.</p> <p>Note that this determination currently rests with the audit team. During Phase 2, AWS may develop guidelines for limiting the acceptable number of minor non-conformities.</p> <p style="font-size: small;">* closed = actioned by the client, corrections &amp; corrective actions verified and closed by the auditor.</p>
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Note: If corrective actions are inadequate to resolve a minor non-conformity by the time of the next scheduled audit, the CAB shall upgrade the audit finding to a major non-conformity.

BM TRADA is unable to issue / reissue an AWS certificate of approval until all non-conformities are verified and closed.

***Failure to address and close nonconformities within required timescales will result in suspension of certification.***

**Opportunity for Improvement**

All other finding that are not major or minor non – conformities can be raised as observations or opportunities for improvement. Opportunities for Improvement are issued when evidence shows that the finding does not conform to the definition of NCR and that auditor judgement and experience indicate is not likely to result in failure of the management system or to reduce its ability to assure controlled processes and products.

Your auditor will clarify at the closing meeting if you require a follow up audit to verify correction and corrective action implementation or if documentary evidence will be acceptable to close the nonconformity.



# 1. Client and Certificate Details

## Client & Site Details

<b>Address of certified operation:</b>	Grants Road, Somerville, Victoria, Australia		
<b>Management representative:</b>	Greg Menz, HSE manager		
<b>Contact email address:</b>	gmenz@ingham.com.au		
<b>Contact phone number:</b>	0421051662		
<b>Website address:</b>	www.ingham.com.au		

## BM TRADA Certificate Details

<b>Type of certificate:</b>	Single site		
<b>AWS Reference number:</b>	AWS-01.0-INT-BMT-00-07-0002-0002	<b>Date of first certification:</b>	24 November 2015
<b>Current Certificate start date:</b>	24 November 2015	<b>Current Certificate expiry date:</b>	23 November 2018

# 2. Details of Audit and Scope of Certification

## Audit Details

<b>Audit type:</b>	Initial	Surveillance	Re-certification <input checked="" type="checkbox"/>
<b>Audit team and roles:</b>	Kevin OGrady - Lead Auditor Graeme Lea = Local Auditor David Tiller – on call Catchment specialist and technical advisor. Not on site		
<b>Standard:</b>	The AWS International Water Stewardship Standard Version V1.0 April 8 <sup>th</sup> 2014		

## Scope of Certification

**Scope of Certification:**

Water Stewardship in slaughter and processing of Poultry.

**Description of the catchment in which the client operates:**

Watson Creek (also called Biningnaring Creek) is a small coastal stream that rises near Baxter/South Frankston and flows through Somerville and Pearcedale over a distance of approximately 10km to Watson Inlet in Western Port. Western Port is a UNESCO biosphere reserve. Watson Creek has been highly modified, with the natural channel form changed by channelization and loss of wetlands that once were common on its floodplain. The catchment was almost entirely cleared for grazing and horticulture and in more recent times urbanization has increased substantially. The riparian zone for much of its length is in poor condition and generally dominated by weeds but with noted EVCs classes – swampy scrub (053 – scattered and rare) Swampy Woodland (937 - Endangered) Grassy Woodland (175 - Fragmented). Remnant native vegetation is rare, mainly confined to headwater areas and lower reaches prior to its discharge into Western Port. In recent years riparian re-vegetation programs have been undertaken. Somerville also draws its water supply from a much larger catchment that forms part of the reticulated water supply network for greater Melbourne. This includes water sourced from headwater impoundments in the Yarra and Thompson Rivers.

**Summary of shared water challenges :**

Water challenges in the Watsons Creek catchment include; excessive nutrients, low dissolved oxygen, sedimentation, morphological changes, weeds and altered flow regime. Nutrients are believed to be the major concern as they lead to excessive in-stream plant growth and subsequently low dissolved oxygen levels. Nutrients largely arise from agriculture (including market gardens), erosion in the catchment and the unstable bed and banks of the creek. Organic loads from urban stormwater would also contribute to low dissolved oxygen. Nutrient loads are also likely to be having an impact on Yaringa Marine Park. While agriculture has been the major contributor of contaminants, particularly nutrients and sediment, to Watsons Creek, the ever-expanding urban areas in the catchment are likely to be a major future threat. Stormwater management will become an even more important issue in future. Restoring the riparian zone will assist in reducing nutrient and sediment loads to the creek and Western Port and will also improve ecological health and assist in the restoration of a more natural stream morphology and flow regime. The Broader catchment is the western Port catchment.

### 3. Executive Summary

#### Main processes / Activities / Places Inspected

Main processes/ activities / places inspected (including names & affiliations of people consulted)	Number of NCRs
Step 1 Commit. Greg Menz	
Step 2 Gather and Understand. Greg Menz	1
Step 3 Plan. Greg Menz	
Step 4 Implement. Greg Menz	
Step 5 Evaluate. Greg Menz	
Step 6 Communicate and Disclose. Greg Menz	1

<b>Total number of nonconformities issued at this audit:</b>	2
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**Previous NCR(s)**

Were there any NCR(s) issued at the previous audit? Yes X      No

**Allocation of points and Lead Auditor Recommendations**

<p>Core Criteria. Subject to NCRs being closed out the recommendation is to award all points under core certification criteria.</p> <p>Core level 39</p> <p>Advanced Criteria: (points)</p> <p>Step 1 13</p> <p>Step 2 17</p> <p>Step 3 13</p> <p>Step 4 33</p> <p>Step 5 3</p> <p>Step 6 2</p> <p>Total 81</p>
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**Note:** the above recommendation is subject to review and (continued) Certification / Recertification decision.

**Allocation of Points**

The audit team shall complete the allocation of points within thirty (30) days of completion of the on-site audit and, in any event, before finalizing the assessment report.

Where a client has one or more unresolved major nonconformity, the audit team shall not allocate points to any advanced-level indicators.

Prior to allocating points, the audit team shall review the assessment results to confirm that the client has met all core indicators.

Where one or more minor non-conformity has been raised against core indicators, the audit team should consider the adequacy of corrective action plans submitted by the client when applying.

Audit teams shall award points in accordance with the indicator-specific point allocation system given in the AWS Standard.

Certification level shall be determined based on the total sum of points awarded, in any combination, to all advanced-level indicators.

Thresholds for the three (3) AWS certification levels are given in Table 2.

Table 2. Thresholds for AWS Certification Levels.

Point Total	AWS Certification Level
0 to 39	AWS Core Certified
40 to 79	AWS Gold Certified
80 or greater	AWS Platinum Certified

## 4. Audit Observations, Findings and Conclusions

### Description of Operation

**Inghams Enterprises (Inghams) is a multifaceted company that is today a large and significant contributor to the food industry and in particular the poultry industry with over 8,500 employees, operating in all States in Australia and New Zealand.**

**Inghams was founded in 1918 and remained a family owned business until 2013 when sold to TPG Capital.**

**Poultry production and stock feed manufacture are the core business of the company which today encompasses fully integrated farming, hatching, feed production, primary and further poultry processing activities**

**Integrated operations include:**

- Breeding of poultry to produce fertile eggs;
- Hatching chicks from the fertile eggs in hatcheries;
- Production of fresh, value enhanced and cooked poultry meats;
- Production of a range of livestock feeds;
- Conversion of offal to make poultry meal and poultry tallow for stock feed and some pet food ingredients and additives; and
- Research into nutrition, health, animal husbandry and product development.

**Inghams is Australia and New Zealand's leading integrated poultry producer, supplying leading retail, QSR and food service customers, processing 3.6 million birds per week and employing more than 8,500 people across its 260 farms, eight hatcheries, eight feed mills, seven primary processing and five further processing plants.**

**Inghams Somerville primary processing plant was originally a Golden Poultry site constructed in the late 1960s. Ingham purchased the site from Golden Poultry in 1976. The facility was rebuilt following the majority of the processing portion of the original plant being destroyed by fire in January 2010. Approximately 700 on-plant staff are employed at Somerville PPP plus 30 maintenance and 40 office staff.**

**Poultry is processed on a continuous conveying system. Live birds are hung on a shackle conveyor that moves continuously through the kill and evisceration area. Wastes are generated and collected**





## Documented Procedures

### Step 1 – COMMIT

Step 1 ensures that there is sufficient leadership support to enact the rest of the criteria within the Standard. This step also relates to commitments to legal/regulatory compliance and rights-related issues, which underpin water stewardship.

#### Core criteria

Note: the guidance notes in the AWS standard should be used in evaluating compliance to the criterion and indicators.

Core Criteria	Indicators	Response Area
<p><b>1.1 Establish a leadership commitment on water stewardship:</b></p> <p>Have the senior-most manager at the site, and if necessary a suitable individual within the corporate head office, sign and publicly disclose a commitment to:</p> <ul style="list-style-type: none"> <li>• Uphold the AWS water stewardship outcomes (good water governance, sustainable water balance, good water quality status and healthy status of Important Water-Related Areas);</li> <li>• Engage stakeholders in an open and transparent manner;</li> <li>• Strive to comply with legal and regulatory requirements</li> <li>• Respect water-related rights, including ensuring appropriate access to safe water, sanitation and hygiene for all workers in all premises under the site's control;</li> <li>• Support and coordinate with public sector agencies in the implementation of plans and policies, including working together towards meeting the human right to water and sanitation.</li> <li>• Continually improve and adapt the site's water stewardship actions and plans;</li> <li>• Maintain the organizational capacity necessary to successfully implement the AWS Standard, including ensuring that staff have the time and resources necessary to undertake the implementation;</li> <li>• Support water-related national and international treaties;</li> </ul>	<p><b>1.1.1 Signed and publicly disclosed statement that explicitly covers all requirements (see details in Criterion 1.1).</b></p>	<p>Signed documents demonstrated commitment to water stewardship and covers the requirements in 1.1</p> <p>Evidence Site Commitment document endorsed by CEO Mick McMahon updated and signed by new plant manager Gerard Segrave Nov 2017. Publicly available at:</p> <p><a href="http://s3-ap-southeast-2.amazonaws.com/ingham/wp-content/uploads/2017/11/14192241/Water-Stewardship-Site-Commitment-Statement-2.pdf">http://s3-ap-southeast-2.amazonaws.com/ingham/wp-content/uploads/2017/11/14192241/Water-Stewardship-Site-Commitment-Statement-2.pdf</a></p> <p>This online commitment was Viewed at the audit.</p> <p>The wording unchanged since last audit.</p> <p>Note that the CEO of Ingham's will change in the near future.</p>

<ul style="list-style-type: none"> <li>• Disclose material on water-related information to relevant audiences.</li> </ul>		
<p><b>1.2 Develop a water stewardship policy:</b></p> <p>Develop an internally agreed-upon and communicated and publicly available water stewardship policy that references the concept of water stewardship (as informed by the AWS Standard, outcomes and criteria).</p>	<p><b>1.2.1 Publicly available policy that meets all requirements (see Guidance)</b></p>	<ul style="list-style-type: none"> <li>• Policy "06-POL-ENVIRON" dated Sept 2016 forms part of the plant EMS and is an AWS specific document displayed in the foyer at Somerville and on the company web site:</li> <li>• Environmental Policy is scheduled for automatic review Sept 2019.</li> <li>• Environmental Policy is for the whole group now only signed by the CEO</li> <li>• Policy clearly states that the implementation of the policy is the responsibility of all personnel</li> <li>• The policy is available on the Ingham intranet to staff and relevant management and staff such as the site (Confirmed on site at the audit)</li> </ul> <p>Sustainability Committee (teams at each site) are aware of the policy.</p> <ul style="list-style-type: none"> <li>• Site Manager has signed a personal commitment to goals and principles of Water Stewardship, CEO has endorsed same commitment.</li> </ul>

### Advanced criteria

Note: the guidance notes in the AWS standard should be used in evaluating compliance to the criterion and indicators.

Advanced Criteria	Indicators	Response Area
<p><b>1.3 Further the alliance for Water Stewardship</b></p> <p>Commit to an AWS training programme or commit to AWS membership or get a commitment from one or more other sites to implement an AWS programme (membership, standard &amp; certification or training).</p>	<p><b>1.3.1 Official registration with AWS</b></p>	<p>Inghams Somerville site has committed to a number of water related initiatives, including:</p> <ul style="list-style-type: none"> <li>• Inghams has been and continues to be a key supporter of WSA through the active support of Julia Seddon, GM corporate affairs, who was involved in development of finalised AWS standard released in 2014</li> <li>• Preliminary Water Stewardship commitment and development begun in 2013 with interim plan and self-assessment completed then (in 2013)</li> <li>• Somerville site AWTP Manager Hudson Cameron attended Advanced level WSA training in 2015. In 2017 staff from Brisbane, South Australia and Victoria (Somerville) including the Plant manager and HSE manager at the Somerville site.</li> <li>• Ingham's Somerville are currently partnering with the Westernport Biosphere Foundation NGO to develop Water Stewardship projects with other businesses and organisations in the Watson Creek Catchment.</li> <li>• The Ingham Somerville site is a participating member of the Watson Creek Catchment Group. Sighted: An acknowledgement letter from Western Port Biosphere thanking Ingham's for this initiative.</li> </ul> <p>In 2018 The Western Port Biosphere have got additional organisation to commit to water stewardship. Ingham's still maintain an involvement.</p> <p>The Watson Creek Catchment Group, a local Landcare group, is committed to improving the quality of the water and broader catchment of the Watson Creek that is adjacent the site.</p> <ul style="list-style-type: none"> <li>• Ingham's Somerville site achieved AWS Gold level certification in November 2015.</li> </ul>

		<ul style="list-style-type: none"> <li>• Inghams achieved Water Stewardship certification of its Te Aroha site in New Zealand in 2017.</li> <li>• Inghams achieve Water Stewardship certification at its Murarrie plant in Queensland at the Gold level in 2018.</li> </ul> <p>9 Points</p>
<p><b>1.4 Commit to other initiatives that advance effective water stewardship</b></p> <p>Commit to additional, voluntary and complementary water-related initiatives. Qualifying initiatives must:</p> <ul style="list-style-type: none"> <li>• Be voluntary in nature;</li> <li>• Be commonly accepted as best practices or processes for effective water management;</li> <li>• Explicitly contain references to water (even if this is not their primary purpose);</li> <li>• Contain a time-bounded commitment for taking action to improve use of water resources;</li> <li>• Not be redundant with existing requirements from the AWS Standard (i.e., the site cannot get credit for commitments that would have been already required by the AWS Standard);</li> <li>• Intend to deliver additional social or environmental benefits, keeping with the definition of water stewardship.</li> </ul>	<p><b>1.4.1 Formal commitment to qualifying initiative(s), including a timeline for completion</b></p>	<p>Initiatives are in place.</p> <ul style="list-style-type: none"> <li>• 2007 Signed a stakeholder led multi-member agreement to look for ways to improve Watson Creek quality (now competed).</li> <li>• Advanced Water Treatment Plant installed on site at Somerville in 2011 to treat and recycle wastewater created by the operations and processes of the business.</li> <li>• Program to plant native vegetation along Watson Creek banks. (additional 540 trees planted between November 16 and May 17) Evidence: invoice and summary of works from Peninsula Bush works.</li> <li>• Partnered with Mornington Peninsula Shire to complete a Water Sensitive Rural Land improvement project in 2014/15</li> <li>• The AWTP goal is to maintain and if possible improve water recycling efficiency thereby improving water use intensity. Goals are set annually through the site Environmental Management Plan (EMP) (Goals and results over 3 years seen)</li> <li>• Ingham has partnered with Westernport Biosphere and local stakeholders for a catchment based Water Stewardship Project on the Watson Creek the waterway adjoining the site. This is ongoing with Ingham's presented with an award as a water steward on 16<sup>th</sup> November 2017.</li> <li>• The AWTP trade waste limits are designed to enable the authority (South East Water) to provide recycled water for irrigation in times of water scarcity or drought by maintaining a maximum daily discharge limit for sodium</li> </ul> <p>Additional Evidence -sustainability action plans 2017/18 refers to WSP and associated actions.</p> <p>2018 viewed the Western Port Biosphere report card 2016-2017 which acknowledges the input and assistance from Ingham's.</p> <p>In 2018 the involvement has been just to keep a watching brief and commit to continual involvement.</p> <p>3 Points</p>

<p><b>1.5 Secure a water stewardship commitment from the organization's senior most executive or the organization's governance body</b></p> <p>The site's commitment in 1.1 is also signed off by the senior-most executive in the organization or the overarching governance body that oversees the site's organization.</p>	<p><b>1.5.1 Appropriately signed and publicly available statement that explicitly covers all requirements (see details in Criterion 1.1)</b></p>	<p>•Site Commitment document endorsed by CEO Mick McMahon NOV 2017 displayed in foyer of administration building of Somerville site.</p> <p>Note the CEO is departing and there will be a new incumbent soon.</p> <p>1 point</p>
<p><b>1.6 Prioritize communities' rights to water</b></p> <p>The site publicly commits that if the human right to water and sanitation is unmet, and if requested by the community, the site will provide direct assistance from its own allocations of 20L per person to assist communities for their water-related needs.</p>	<p><b>1.6.1 Signed and publicly disclosed statement that explicitly covers all requirements</b></p>	<p>Not Assessed</p> <p>Lack of WASH is not considered an issue.</p>

## **Step 2 – GATHER AND UNDERSTAND**

Step 2 ensures that the site gathers data on its water use and its catchment context and that the site employs these data to understand its shared water challenges as well as its contributions (both negative and positive) to these challenges and to water-related risks, impacts and opportunities. This information also informs the development of the site's water stewardship plan (Step 3) and guides the actions (Step 4) necessary to deliver upon the commitments (Step 1).

### **Core criteria**

Note: the guidance notes in the AWS standard should be used in evaluating compliance to the criterion and indicators.

<b>Core Criteria</b>	<b>Indicators</b>	<b>Response Area</b>
<p><b>2.1 Define the physical scope</b></p> <p>Identify the site's operational boundaries, the sources the site draws its water from, the locations where the site returns its discharge to, and the catchment(s) that the site affect(s) and is reliant upon.</p>	<p><b>2.1.1 Documentation or map of the site's boundaries</b></p> <p><b>2.1.2 Names and location of water sources, including both water service provider (if applicable) and ultimate source water</b></p> <p><b>2.1.3 Names and location of effluent discharge points, including both water service provider (if applicable) and ultimate receiving water body</b></p> <p><b>2.1.4 Geographical description or map of the catchment(s)</b></p>	<p><b>2.1.1</b> A map of the site's boundaries is included in the document "Environmental Management Plan Somerville – September 2017. The proposed biodiversity layers have not yet been added.</p> <p>This was again verified at the 2018 audit that the biodiversity layers have not been added to the maps in the EMP, however the auditor cannot find this in 2.1.</p> <p>Water effluent points shown on maps. Catchment maps were seen with water coming from the SE Water Supply System. The WSP is dated August 2018</p> <p><b>2.1.2</b> The name and location of water sources is described in the WSP and includes the South East Water maps of water sources which were viewed and are now part of the updated WSP.</p>

		<p>2.1.3 The site discharges 'Trade waste' water and stormwater. Trade waste is discharged to Port Philip Bay near 'Boags Rocks' after processing by Melbourne Water at Mt Martha. Stormwater is managed on site by Inghams and is discharged from the site to Watson Creek. Stormwater is managed on site by Ingham's and is discharged from the site to Watson Creek only if an overflow occurs from excessive rainfall. Effluent discharge is summarised in the document 'Western Port Catchment "WSA Western Port Catchment Indicator Analysis 2015", v3 and v3 supplementary report. and remains the same for 2018.</p> <p>The site is currently investigating opportunities to recover all water, regardless of the amount, by increasing pump and line capacities, allowing for faster and increased water recovery There is a similar report on trade waste effluent and volumes - reviewed summary report (this is a monthly report) for the single trade waste discharge point – which consists of brine coming of the RO plant, confirmed at the 2018 audit from interview with the treatment plant operator.</p> <p>2.1.4 The site is part of the local catchment of Watson Creek. The site's water supply is part of the much larger reticulated Melbourne Water catchment and can include desalinated sea water. The larger catchment is shown in the South East Water document "Where does my water come from". Reviewed at the 2018 audit A geographical description of the Watson Creek is included in the site Environmental Management Plan and the map in the WSP 2018.</p>
<p>2.2 Identify stakeholders, their water-related challenges and the site's sphere of influence</p> <p>Identify stakeholders, document their water-related challenges and explain how the stakeholders are within the site's sphere of influence.</p>	<p>2.2.1 List of stakeholders, descriptions of prior engagements and summaries of their water-related challenges</p> <p>2.2.2 Description of the site's sphere of influence</p>	<p>2.2.1 The "Somerville PPP Water Stewardship Stakeholder List" contains a list of stakeholders, engagement and shared water challenges and is now incorporated into the WSP 2018.</p> <p>Reported that there was no external water related issues raised in the audit period</p> <p>The Stakeholder list has been updated with the addition of neighbours after requests for</p>

		<p>weed control, reviewed at the 2018 audit, confirming that neighbours form part of the Watson Creek Catchment Group, and regular interactions at committee meetings re weed removal.</p> <p>Obs 1/18: The S/H Register has information added throughout the year, but it is difficult to identify this as entries are not dated. Ingham's must include dates in the Stakeholder register to prove currency.</p> <p>The Environmental Management Plan contains a map and names of neighbours of the site. No reported change since the last audit) apart from the Stakeholder list being included in the WSP. Neighbours are now included in the stakeholder list and indigenous stakeholders are also identified.</p> <p>2.2.2 The Stakeholder List contains a list of stakeholder's ability to influence or be influenced. The site's Self-Assessment describes the sites sphere of influence as shown in Figure A5 of the Guidance. The requirement is met.</p>
<p><b>2.3 Gather water-related data for the catchment</b> Gather credible and temporally relevant data on the site's catchment:</p> <ul style="list-style-type: none"> <li>• Water governance, including catchment plan(s), water-related public policies, major publicly led initiatives under way, relevant goals, and all water-related legal, regulatory requirements;</li> <li>• Water balance for all sources while considering future supply and demand trends;</li> <li>• Water quality for all sources while considering future physical, chemical and biological quality trends;</li> <li>• Important Water-Related Areas, including their identification and current status, while considering future trends;</li> <li>• Infrastructure's current status and exposure to extreme events while considering expected future needs</li> </ul>	<p><b>2.3.1 List of relevant aspects of catchment plan(s), significant publicly led initiatives and/or relevant water related public policy goals for the site</b></p> <p><b>2.3.2 List, and description of relevance, of all applicable water-related legal and regulatory requirements, including legally defined and customary water rights and water-use rights</b></p> <p><b>2.3.3 Catchment water balance by temporally relevant time unit and commentary on future supply and demand trends</b></p> <p><b>2.3.4 Appropriate and credibly measured data to represent the physical, chemical and biological status of the site's water source(s) by temporally relevant time unit, and commentary on any anticipated future changes in water quality</b></p> <p><b>2.3.5 Documentation identifying Important Water Related Areas, including a description of their current status and commentary on future trends</b></p> <p><b>2.3.6 Existing, publicly available reports or plans that assess water-related infrastructure, preferably with content exploring current and projected sufficiency to meet the needs of water uses in the</b></p>	<p>2.3.1 2.3.1 The company is involved in the Western Port Bay Biosphere project. The project document "Water Stewardship Australia Western Port Catchment Analysis" lists public policies and initiatives that meet the requirement. This project is ongoing since the last audit.</p> <p>Reviewed the Western Port Biosphere Report Card 2016-2017 that contains multiple publicly lead water initiatives and goals for the next three years.</p> <p>2.3.2 The Environmental Management Plan (version dated September 2017) for the site contains a list of applicable Acts and legally defined water licenses . This statement has now been included in section 2.3.2 of the WSP ( Legal and regulatory Requirements), there are no customary water rights and water use rights to the site, This was confirmed by Ingham's contacting the Bunurong Land Council, as traditional owners, who referred Ingham's to the Mornington Peninsular Council who reportedly had map overlays, however the</p>

	<p>catchment, and exposure to extreme events</p>	<p>council no longer has an archaeologist then referred Ingham's back to the Bunurong Land Council. Ingham's have not contacted the landowners again to date.</p> <p>Observation 2.3.5: Ingham's could contact the archaeologist who has done the survey of the Ingham's site and Watsons Creek confirming no interest in the site and at the same time clarifying any significance of the site seen in Watsons Creek (Bunurong Swamp)</p> <p>The EH&amp;S Manager reported that the Acts and Regulations list is reviewed annually, and he also reviews websites and blog sites ensuring that Ingham's remains current with environmental regulations. The Group Environmental Manager also receives weekly legal updates from the Australian Sustainability Business Group, and has now included Greg Menz as part of the distribution of these emails.</p> <p>2.3.3 Melbourne Water publishes an annual water balance for the catchment, and a daily breakdown of water storages and changes. The "Western Port Catchment Analysis" references a 2013 Melbourne Water report which assesses (then) future supply for 2014. The South East Water "2013-2018 Water Plan" provides commentary on future supply and demand trends. This is still the latest version.</p> <p>2.3.4 The regulated supply of potable water to the site meets the requirement for appropriate and credibly measured water quality data. The site Self-Assessment identified South East Water's website of real time water quality analysis. There a report of drinking water quality by SE water dated October 2017 for 2016-17 However, documentation for the site does not address potential future changes to water quality.</p> <p>The auditor reviewed the WSP 2018 which states that there were no water quality related issues in the audit period, and that there it is not anticipated that there will be any changes in the near future SE Water makes the latest water quality test by locations available on the internet.</p>
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		<p>Ingham's can access this information, (Results up to 13 November 2018 were sighted).</p> <p>2.3.5 The "Western Port Catchment Analysis identifies Important Water Related Areas in the Watson Creek catchment and identifies sources of information. (no change since last audit)</p> <p>Ingham's have done research on impacts of post bushfires and climate change however there is no real commentary on future trends from the authority on the impacts of future trends on Important Water Related Areas.</p> <p>The WSP 2018 identified from the Port Phillip Catchment Strategy Plan that sets targets for both 20 year and 100-year future outcomes. (refer section: Waterways and Wetlands – Targets). The aim is to maintain and improve for the next 20 years and beyond, and includes specific species in waterways, their trends, condition, as well as 20 year and long-term goals.</p> <p>2.3.6 The Western Port "Catchment Indicators Analysis supplement" contains a list of Bureau of Meteorology National Water Accounts for Melbourne, and includes infrastructure information for the catchment. The South East Water "Drought Response Plan 2012" and "Corporate Plan 2015-2020" address drought as the major extreme event for the catchment.</p> <p>Ingham's have engaged in their own research on impacts of future extreme events as part of a climate resilience exercise for all sites which resulted in a Life Cycle Analysis (LCA) tool being developed to quantify the impacts.</p>
<p>2.4 Gather water-related data for the site</p> <p>Gather credible and temporally relevant data on the site's:</p> <ul style="list-style-type: none"> <li>• Governance (including water stewardship and incident response plan);</li> <li>• Water balance (volumetric balance of water inputs and outputs);</li> <li>• Water quality (physical, chemical and biological quality of influent and effluent) and</li> </ul>	<p>2.4.1 Copies of existing water stewardship and incident response plans</p> <p>2.4.2 Site water balance (in Mm3 or m3) by temporally relevant time unit and water-use intensity metric (Mm3 or m3 per unit of production or service)</p> <p>2.4.3 Appropriate and credibly measured data to represent the physical, chemical and biological status of the site's direct and outsourced water effluent by</p>	<p>2.4.1 The Water Stewardship Plan (WSP) for the site was reviewed in 2018 and is now a standalone document, there is some similarities with the EMP but the WSP is clearly aligned to the Water Sustainability standard.</p> <p>The latest version of the WSP is dated August 2018.</p> <p>The site has an Emergency Response Procedure (3.11 –</p>

<p>possible sources of water pollution;</p> <ul style="list-style-type: none"> <li>• Important Water-Related Areas (identification and status);</li> <li>• Water-related costs (including capital investment expenditures, water procurement, water treatment, outsourced water-related services, water-related R&amp;D and water-related energy costs), revenues and shared value creation (including economic value distribution, environmental value and social value).</li> </ul>	<p>temporally relevant time unit, and possible pollution sources (if noted)</p> <p>2.4.4 Inventory of all material water-related chemicals used or stored on-site that are possible causes of water pollution</p> <p>2.4.5 Documentation identifying existing, or historic, onsite Important Water-Related Areas, including a description of their status</p> <p>2.4.6 List of annual water-related costs, revenues and description/quantification of social, environmental or economic value generated by the site to the catchment</p>	<p><b>Emergency Preparedness and response) includes spills, leakages etc hazardous substances, and leads to sub documents which detail actions to specific circumstances</b></p> <p><b>2.4.2 A yearly summary of water balance by sector of operation was provided in the “QA HACCP” document</b></p> <p>Water balances are now considered “live” and can be viewed in the “Azzo” sub metering system”. This was demonstrated for the auditors and can provide data from any specific point, ie 15-minute readings thru to reviews of annual and historical data</p> <p>Daily water balance and monthly summaries are available back to the commissioning of the new plant in 2011. The “AWTP Daily Flow Totals” spreadsheet conforms to the definition of site water balance.</p> <p>This document was viewed at the 2018 audit and includes monthly data from November 2017 to 5th Nov 2018 weekly report, with data input by operators at the AWTP on site, who were also interviewed by the auditors</p> <p>The “AZZO” system is now in place and used for daily tracking and is being actively promoted to supervisors on site to allow them to track water usage., but also to allow them to see water usages, and to interact with management when changes are seen. This system was reviewed by the auditors</p> <p>There is also a database ENVIZY that compares water balance data between sites, this is used by Somerville, reviewed weekly, and is helpful for comparing other Ingham sites and assists with account management loaded into ENVISY</p> <p>2.4.3 The “AWTP Ingham’s Somerville Results Master” spreadsheet contains water quality measurement data as specified in the Trade Waste Agreement with South East Water.</p> <p>Records up to September 2018 were viewed. Reviewed sample point collection data, last sampled (quarterly) on 22/8/18</p> <p>2.4.4. The spreadsheet “SDS June 2017DG Haz Substances (inspected)” contains a comprehensive register and inventory of chemicals used at</p>
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		<p>the site. It now also identifies water-related chemicals, those that are possible sources of pollution, and where they are stored on site.</p> <p>2.4.5 The Environmental Management Plan (August 2018) for the site contains a list and map of Important Water Related Areas. Staff also identified a recently recognised area of indigenous cultural significance the Cumbungi swamp, located just outside the company boundary with Watson Creek in the update of the Plan.</p> <p>Recent updates include new information currently being gathered on salinity in Watson Creek to confirm that it does not originate from the site.</p> <p>There were also several frog census's carried out in 2014, 2015 and 2016, undertaken and this may add new RTE species. This has not been repeated in 2017. Frog census data collected sent to "Frogs at Melbourne Water", however specific results were not available for Watsons Creek.</p> <p>Results from a survey by WSP Consultants, which included on foot surveys by an ecologist, onsite cameras and toadlet voice calls looking for specimens of the Southern Brown Bandicoot and a Southern Toadlet did not locate any sighting in the area. No other HCV's seen</p> <p>2.4.6 Extensive data on the water-related costs and revenues for the site and catchment were provided in the "Somerville Sustainability Report" (weekly report), "Somerville PPP Water Treatment Actual Costs", "Somerville PPP Processing Actual Costs 2014-2015" and "KPI Performance Indicators Actual 2014-2015". These have been updated to include social and environmental values of the site to the catchment in the document "Comparison of AWTP expenditure 2012-2015". These are figures only e.g. amount of wastewater recycled.</p> <p>Reviewed section 2.4.6 (Water Related Costs) in the WSP confirming financial data for the 2017/18 financial year is included in the document.</p>
<p><b>2.5 Improve the site's understanding of its indirect water use</b></p> <p>Identify and continually improve the site's understanding of:</p>	<p><b>2.5.1 List of primary inputs with their associated embedded annual (or better) water use and (where known) their country/region/or catchment of origin with its level of water stress</b></p>	<p><b>2.5.1 The "Vic Farming Sustainability Report Aug 2015" spreadsheet shows water use at broiler farms, which are the primary input to</b></p>

<ul style="list-style-type: none"> <li>• Its primary inputs, the water use embedded in the production of those primary inputs and, where their origin can be identified, the status of the waters at the origin of the inputs;</li> <li>• Water used in outsourced water-related services within the catchment.</li> </ul>	<p><b>2.5.2 List of outsourced services that consume water or affect water quality and both (A) estimated annual (or better) water withdrawals listed by outsourced services (Mm3 or m3) and (B) appropriate and credibly measured data to represent the physical, chemical and biological status of the outsourced annual (or better) water effluent</b></p>	<p>the site. It also records embedded water from operations at the feed mill, hatchery and breeder farm. A scientific journal article ‘Life Cycle Assessment of “Cradle to Retailer” aspects of Ingham operations’ includes embedded water use averages across Ingham’s Australian operations. Water stress in the catchment is measured and monitored by Melbourne Water (see 2.3.3 above).</p> <p>This information is unchanged since the 2016 audit.</p> <p>The site is working on an LCA tool including water use impact. This will lead to an LCA update quarterly.</p> <p>At the time of the 2018 audit the Ingham’s LCA Tool has not been updated since 2016, however the auditor was able to confirm this data is available for Somerville from the Environmental KPI Tracking Spreadsheet.</p> <p><b>2.5.2 The site Self-Assessment, the “Vic Farming Sustainability Report Aug 2015”, contains a list of the major outsourced services that consume water, including withdrawals from the Melbourne Water supply system. Water effluent from the site is measured by South East Water at the point where it enters the wastewater treatment system. Chickens from Broiler Farms contains the greatest amount of embedded water but produce little or no effluent as most water is used for drinking or embedded in feed stock. Effluent for other outsourced areas, for example Hatcheries, is measured by South East Water wastewater officers. Ingham’s receive this data but should incorporate this into their water stewardship plan. No change in the 2017 audit.</b></p> <p>Effluent for outsourced areas, for example Hatcheries, is measured by South East Water wastewater officers. Ingham’s get this data but should incorporate this into their water stewardship plans and review. This observation is raised again from 2017 surveillance.</p> <p>2018 Update: Effluent data from outsourced areas is available in the ENVIZI database, derived from accounts sent by SE Water for trade waste with data from the previous 12 months, reviewed</p>
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		by the Sustainability Team at Ingham's
<p><b>2.6 Understand shared water-related challenges in the catchment</b></p> <p>Based upon the status of the catchment and stakeholder input, identify and prioritize the shared water-related challenges that affect the site and that affect the social, environmental and/or economic status of the catchment(s). In considering the challenges, the drivers of future trends and how these issues are currently being addressed by public-sector agencies must all be noted.</p>	<p><b>2.6.1 Prioritized and justified list of shared water challenges that also considers drivers and notes related to public-sector agency efforts</b></p>	<p><b>2.6.1</b> The document "Somerville PPP Water Stewardship Shared Water Challenges 2015" (still current) contains a list that meets the requirements..</p> <p>The 2015 plan is still in force but has not been reviewed and updated since the management review cycles are currently scheduled after the AWS audit.</p> <p>Review of WSP for Inghams Somerville PPP_Nov 2016 .docx". Inghams WSP table 8 action items completion progress is detailed including updated shared water challenges. At the 2018 audit it was noted that the above data required is now in the WSP section 2.6 Shared Water Challenges, reviewed by the auditor</p>
<p><b>2.7 Understand and prioritize the site's water risks and opportunities</b></p> <p>Based upon the status of the site, existing risk management plans and/or the issues identified in 2.6, assess and prioritize the water risks and opportunities affecting the site.</p>	<p><b>2.7.1 Prioritized list of water risks facing the site, noting severity of impact and likelihood within a given time frame</b></p> <p><b>2.7.2 Prioritized list of water-related opportunities for the site</b></p> <p><b>2.7.3 Estimate of potential savings/value creation</b></p>	<p><b>2.7.1</b> The document "Somerville PPP Water Stewardship Risks 2015" contains a list of water risks that meets the requirements. This is now included in the WSP 2018 section 2.7.1 (Water Risks) reviewed by the auditor</p> <p><b>2.7.2</b> The document "Somerville PPP Water Stewardship Opportunities 2015" contains a prioritised list of water-related opportunities for the site.</p> <p><b>2.7.3</b> The summary of water costs contains a summary of savings and value. This data is available from the WSP 2018 section (Estimate of potential savings and value creation) section 2.4.6 (Water Related Costs)</p>

### **Advanced criteria**

Note: the guidance notes in the AWS standard should be used in evaluating compliance to the criterion and indicators.

<b>Advanced Criteria</b>	<b>Indicators</b>	<b>Response Area</b>
<p><b>2.8 Support and undertake joint water-related data collection:</b></p> <p>Engage in data gathering with two or more other organizations in the catchment or join a public-sector-led</p>	<p><b>2.8.1 Evidence of water-related data that was jointly gathered</b></p>	<p><b>2.8.1</b> The site is involved in a joint effort with the Western Port Catchment Project which is collecting existing primary data and information for the catchment and presenting it in a consolidated format. There is an intent for the project to gather</p>

<p>effort to gather the information required in Criterion 2.3.</p>		<p>new data. The site has also joined in the Catchment Management Authority catchment action roundtable workshops to gather project-related information to help in working towards the Catchment Management Authority.</p> <p>Catchment goals. The requirement is met as per the Guidance. At the time of the 2018 recertification audit, it was reported that, the company continues to work with the Watson Creek Catchment Group.</p> <p>4 Points</p>
<p><b>2.9 Gather additional, detailed water-related data:</b></p> <p>Gather additional data that goes beyond the core requirements with respect to the site or the catchment, or generate core data in highly data deficient environments, to further refine the site's understanding of its water stewardship context.</p>	<p><b>2.9.1 Water-related data sets that go beyond core requirements – See Guidance for details</b></p>	<p>There is a new project to gather frog data though census to determine if there are RTE species.</p> <p>To qualify the company will need to do more than the project – it must provide a justification as to why it feels this is beyond core requirements.</p> <p>There were also frog census's in 2014, 2015 and 2016 currently being undertaken and this may add new RTE species. This has not been repeated in 2017. Frog census results were sent to the "Frogs at Melbourne Water", however specific results were not available for Watsons Creek.</p> <p>Results from a survey by WSP Consultants, including on foot surveys by an ecologist and onsite cameras and toadlet voice calls looking for Southern Brown Bandicoot and a Southern Toadlet did not locate any sighting in the area. No other HCV's seen</p> <p>3 points</p>
<p><b>2.10 Review a formal study on future water resources scenarios:</b></p> <p>Gather detailed information that explores water usability (quantity and quality) under future scenarios (including extreme events, population and urbanization changes, economic development, possible climate change impact scenarios, and anticipated infrastructure needs) within the catchment and comment on the scenarios' impacts upon the site's growth strategy.</p>	<p><b>2.10.1 Copy of a study that details projected future state conditions relative to current quantity and quality parameters and a comment on potential impacts upon the site's growth strategy</b></p>	<p>Climate resilience impact assessments have been done for all sites based on preparedness for extreme weather events.</p> <p>Reviewed an email from Boram Kean Group Environmental Manager who confirmed that a sustainability project has been undertaken. The previous climate change risk assessment has been taken into consideration and a climate change workshop is scheduled for early 2019. Reviewed Power Point Presentation Climate resilience for Ingham's Strategic Risk Assessment.</p> <p>Reviewed Ingham's Strategic Risks which are analysed out to 2070.</p> <p>The LCA Tool has been updated (October 2018) and the intention is to update this on a 6 monthly basis</p> <p>3 Points</p>
<p><b>2.11 Conduct a detailed, indirect water use evaluation:</b></p> <p>Complete an advanced evaluation of indirect water use related to the site's primary products/services (including outsourced, downstream services) that identifies the location of water use within the site's supply chain and clarifies the site's ability to influence the management of its suppliers' water use.</p>	<p><b>2.11.1 Detailed description of the site's water-related supply chain with indirect water use amounts (for water quantity and quality) and the site's engagement efforts to date for each</b></p>	<p>2.11.1 The site has detailed water-related data on local water embedded use in the document "Vic Farming Consolidated Report Aug 2015" and a consolidated Life Cycle Assessment of other elements of the supply chain from Ingham's plants around Australia that has been published in the peer-reviewed literature</p> <p>The site has gone further. The site is working on an LCA tool including water use impact. This will lead to continually updated information and reporting on a</p>

		<p>quarterly basis. The 2016 beta version is currently in use.</p> <p>At the time of the 2018 audit the data embedded into the Vic Farming Consolidated Report August 2015 is now included in the ENVIZI database and tracked by monthly meeting on site at Somerville.</p> <p>As stated, the LCA has been updated (19 October) by Boram Kean and was reviewed by the auditor and is mentioned in the WSP. Reporting for this information gathering has also been updated, and as the information is significant, this will be reported 6monthly going forwards</p> <p>7 points</p>
<p><b>2.12 Understand groundwater status or environmental flows and the site's potential contributions:</b></p> <p>Gather data on either groundwater status or environmental flows and identify the site's potential contribution. In all cases, coordination with relevant government agencies is required.</p>	<p><b>2.12.1 Conclusions about the site's potential contributions to groundwater recharge or environmental flows restoration</b></p>	Not assessed
<p><b>2.13 Complete a voluntary Social Impact Assessment:</b></p> <p>Complete a voluntary Social Impact Assessment for the site, with a particular focus on water.</p>	<p><b>2.13.1 Social impact assessment report</b></p>	Not assessed

### Step 3 – PLAN

Step 3 focuses on how a site will improve its performance and the status of its catchment in terms of the AWS water stewardship outcomes. Step 3 needs to explicitly link the information gathered in Step 2 to the performance noted in Step 4 by describing who will be doing what and when. The monitoring methods in Step 5 should also reflect the plan.

#### Core criteria

Note: the guidance notes in the AWS standard should be used in evaluating compliance to the criterion and indicators.

Core Criteria	Indicators	Response Area
<p><b>3.1 Develop a system that promotes and evaluates water-related legal compliance:</b></p> <p>Develop, or refer to, a system that promotes and periodically evaluates compliance with the legal and regulatory requirements identified in Criterion 2.3.</p>	<p><b>3.1.1 Documented description of system, including the processes to evaluate compliance and the names of those responsible and accountable for legal compliance</b></p>	<p>•Detailed in EMP August 2018 – Legal obligations (EMP reviewed on annual basis).</p> <p>EMP 5.1 Monitoring, 5.2 Assessment, 5.3 Annual EMP Review, 4.7 non-conformance and corrective and preventative actions.</p> <p>Legal list table 3.1.4.</p> <p>Last year's compliance is included in the EMP as key achievements.</p> <p>It was noted in the EMP table 4.1, (Roles and Responsibilities) that the site manager has overall responsibility for legal compliance. Greg Menz as the HSE Manager then has overall responsibility for implementation of Water Stewardship standard requirements on site</p> <p>The HSE Manager was interviewed throughout the audit and found to have a</p>

		significant understanding of requirements as they apply to the site
<p><b>3.2 Create a site water stewardship strategy and plan:</b></p> <p>Develop an internally available water stewardship strategy and plan for the site that addresses its shared water challenges, risks and opportunities identified in Step 2 and that contains the following components (see Guidance for plan template):</p> <p>A strategy that considers the shared water challenges within the catchment, water risks for the site (noting in particular where these are connected to existing public-sector agency catchment goals) and the site's general response (from Criteria 2.6 and 2.7)</p> <p>A plan that contains:</p> <ul style="list-style-type: none"> <li>• A list of targets (based upon Criterion 2.7) to be achieved, including how these will be measured and monitored. Note: where identified as a shared water challenge, these targets must be continually improving for the four water stewardship outcomes until such time as best practice is achieved;</li> <li>• A list of annual actions that links to the list of targets;</li> <li>• A budget for the proposed actions with cost/benefit financial information (based, in part, upon financial data from 2.7);</li> <li>• An associated list indicating who will undertake the actions (i.e., who is responsible for carrying out the work) and who will ensure that the work is completed (i.e., who is accountable for achieving the target), including actions of other actors in the catchment;</li> <li>• A brief explanation that speaks to how the proposed actions will affect: (A) water-risk mitigation, (B) water stewardship outcomes and (C) shared water challenges.</li> </ul>	<p><b>3.2.1 Available water stewardship strategy</b></p> <p><b>3.2.2 Available plan that meets all component requirements and addresses site risks, opportunities and stakeholder shared water challenges</b></p>	<p><b>3.2.1</b> Ingham's has a strategy document "Ingham's environmental Policy and Water Stewardship strategy." This includes a list of shared challenges .</p> <p>The consolidated report is in draft "summary of water costs" forms part of the WSP August 2018</p> <p><b>3.2.2</b> A tabulated plan exists as per the guidance. This addresses site risks, opportunities and stakeholder shared water challenges.</p> <p>At the time of the 2018 audit the auditor reviewed section 3.2 pf the WSP confirming the table " Water Stewardship Plan (Action Plan) was included in the document</p>
<p><b>3.3 Demonstrate responsiveness and resilience to water-related risks into the site's incident response plan:</b></p> <p>Add to or modify the site's incident response plan to be both responsive and resilient to the water-related risks facing the site.</p>	<p><b>3.3.1</b> A description of the site's efforts to be responsive and resilient to water-related issues and/or risks in an appropriate plan</p>	<p>The Site AWTP has a HACCP manual for operation that includes Emergency Response Protocols in Section 17.</p> <p>There are several examples of responsiveness and resilience:</p> <ul style="list-style-type: none"> <li>• If recycled water does not meet specification reversion to 100% town water is required.</li> <li>• The trade waste pump station has an overflow that diverts to a holding Dam in the event that South East water cannot take effluent. As at 2017 this strategy has resulted in no accidental discharge due to overflow.</li> </ul>



		<ul style="list-style-type: none"> <li>Reviewed the effluent strategy at the 2018 audit, any environmental incidents are reported and reviewed daily at the DOR meetings (Daily Operational Report) no discharges is the audit period</li> <li>There is a triple interceptor to catch run off and there are daily inspections.</li> <li>Climate resilience impact assessments have been done for all sites based on preparedness for extreme weather events.</li> </ul> <p>Refer to section 2.10</p>
<p>3.4 Notify the relevant (catchment) authority of the site's water stewardship plans:</p> <p>Contact the appropriate catchment authority/agency (if any) and inform them of the site's plans to contribute to the water stewardship objectives of their catchment plan as identified in Criterion 2.3.</p>	<p>3.4.1 Documented evidence of communicating the site's plan to the relevant catchment authority/agency</p>	<p>The Somerville WS Plan has not been communicated formally to the Port Phillip and Westernport Catchment Management Authority. However, the PP&amp;WPCMA are part of the WPB Watson Creek Water Stewardship Project and so are aware that Ingham's have a WS Plan. There are minutes available for the WPB Water Stewardship Project Reference Group meetings showing the CMA are in attendance.</p> <p>There are links to shared challenges across several agencies.</p> <p><i>Documents now clarify that the Port Phillip and Western Port CMA is the authoritative planning document.</i></p> <p><b>NCR 01 2018</b></p> <p>Communication with the Port Phillip and Westernport Catchment Management Authority. has not occurred in the audit period, it was explained that company staff changes and lack of activity by the Biosphere Group (due to funding) have contributed to this, however Ingham's must undertake more direct contact with the authorities to communicate the site's plan to the relevant catchment authority/agency</p>

### Advanced criteria

Note: the guidance notes in the AWS standard should be used in evaluating compliance to the criterion and indicators.

Advanced Criteria	Indicators	Response Area
<p>3.5 Gain stakeholder consensus on the site's water stewardship targets:</p> <p>Achieve a consensus amongst stakeholders around at least one of the site's targets to address shared water challenges.</p>	<p>3.5.1 A list that indicates which targets achieved consensus along with a list of stakeholders involved</p>	<p>List provided of targets achieved and that consensus along with a list of stakeholders includes</p> <p>WPB Watson Creek Water Stewardship Project Reference group Stakeholders include:</p> <ul style="list-style-type: none"> <li>Westernport Biosphere Foundation</li> <li>Port Phillip and Westernport Catchment Management Authority</li> <li>Mornington Peninsula Shire Council</li> <li>Melbourne Water</li> <li>South East Water</li> <li>Water Stewardship Australia</li> <li>Inghams</li> </ul> <p>Stakeholders invited but who have had limited engagement in the project so far include:</p> <ul style="list-style-type: none"> <li>Victoria EPA</li> <li>Parks Victoria</li> <li>Southern Rural Water</li> </ul> <ul style="list-style-type: none"> <li>Watson Creek Catchment Group membership.</li> </ul>

		<p>Consensus in targeting improved outcomes for Watson Creek streamside environmental issues was achieved.</p> <p>In general all these engagements continue but there are no new consensus targets.</p> <p>Reviewed the Stakeholder database during the 2018 audit confirming it contains the above contacts and is now included in the WSP</p> <p>Stakeholder interviews indicate that the shared challenge of Watson Creek streamside environmental issues ongoing targets were achieved with stakeholder consensus.</p> <p>7 points</p>
<p><b>3.6 Develop a formal plan for climate change adaptation:</b></p> <p>In coordination with relevant public sector agencies and infrastructure management entities, develop a plan with detailed and explicit water-related adaptation strategies to mitigate risks of projected climate change impacts, including for shared water infrastructure.</p>	<p><b>3.6.1 A set of plans that speak to the site's risk mitigation with respect to projected climate change impacts including for shared water infrastructure</b></p>	<p>Reviewed an email from Boram Kean Group Environmental Manager who confirmed that a sustainability project has been undertaken. The previous Climate Change Risk Assessment has been taken into consideration and a climate change workshop is scheduled for early 2019. The earliest information.</p> <p>Reviewed Power Point Presentation Climate resilience for Ingham's Strategic Risk Assessment.</p> <p>Reviewed Ingham's Strategic Risks which are analysed out to 2070. The LCA Tool has been updated (October 2018) and the intention is to update this on a 6 monthly frequency</p> <p>6 Points</p>

## **Step 4 – IMPLEMENT**

Step 4 is intended to ensure that the site is executing the plan outlined in Step 3, mitigating risks and driving actual improvements in performance.

### **Core criteria**

Note: the guidance notes in the AWS standard should be used in evaluating compliance to the criterion and indicators.

<b>Core Criteria</b>	<b>Indicators</b>	<b>Response Area</b>
<p><b>4.1 Comply with water-related legal and regulatory requirements and respect water rights:</b></p> <p>Meet all applicable legal and regulatory requirements related to water balance, water management and Important Water-Related Areas as well as water-related rights. As noted in Criteria 1.1 and 3.2, where, through its water use, the site is contributing to an inability to meet the human right to safe drinking water and sanitation, the site must also continually work with relevant public sector agencies until this basic human right to water and sanitation is fulfilled.</p>	<p><b>4.1.1 Documentation demonstrating compliance</b></p> <p><b>4.1.2 (Catchments with stakeholders who have an unmet human right to safe drinking water and sanitation) Documentation of efforts to work with relevant public sector agencies to fulfil human right to safe drinking water and sanitation.</b></p>	<p>4.1.1 Detailed in EMP dated August 2018 and demonstrated via Trade Waste Agreement compliance.</p> <p>In 2018 There is also a note in the Water Stewardship plan against compliance to trade waste agreements.</p> <p>No non-compliance with the agreement has occurred in the last year. 2017 and again in 2018.</p> <p>Interview with David Djukimodjo 14/11/18 (Trade Waste Officer) South east water confirms no non-compliance.</p> <p>Review of compliance at sustainability team meetings where compliance is an agenda item and any violations or incidents are recorded.</p> <p>Evidence latest meeting minutes 13 August 2018 no non compliances noted</p> <p>No new issues noted.</p>

		4.1.2 The catchment use is beyond the point where it influences drinking water so there is no unmet need for safe drinking water.
<p><b>4.2 Maintain or improve site water balance:</b></p> <p>Meet the site's water balance targets. As noted in Criterion 3.2., where water scarcity is a shared water challenge, the site must also continually decrease its water withdrawals until best practices are met and work with relevant public sector agencies to address the imbalance and shared water challenge. Note: if a site wishes to increase its water use in a water scarce context, the site must cause no overall increase in water scarcity in the catchment and depletion of the site's water source(s) and encourage relevant public sector agencies to address the unlawful water use contributing to the imbalance in the catchment.</p>	<p>4.2.1 Measurement-based evidence showing that targets have been met</p> <p>4.2.2 (Water scarce catchments only) Evidence of continual decrease or best practice 4.2.3 (Sites wishing to increase withdrawals in water scarce catchments only) Evidence of no net increase in water scarcity</p>	<p>4.2.1 Evidence that targets met: AWTP summary data for 2017-2017 shows flow totals for site including proportion recycled.</p> <ul style="list-style-type: none"> <li>EMP water management target for 2015-16 to exceed 70% recovery was met over 3 years in 2018 it was 72%</li> <li>EMP surface water management target for 2015-16 to exceed 6ML recovery was not met (3.9ML) in 2018 due to lower rainfall and a rupture in the storm water return pipes (discovered this year).</li> <li>EMP wastewater management target for 2015-16 trade waste to not exceed 30% of total water usage was met (25.4%).</li> <li>Target 5% reduction in ltrs per bird. Achieved 3.1% in 2018 (21.8 ltrs per bird) due to 13% lower production volumes.</li> </ul> <p>Best practice is demonstrated by the AWTP and is continued to operate above recovery targets.</p> <p>4.2.2 The catchment can be 'water scarce' and the Melbourne Desalination plant has been built as a contingency. There was a 50GL order for a period between July 2016 and 2017 and 1GL was delivered. There is no order for this year.</p> <p>Melbourne storage levels are between 62.9% at the time of the audit.</p> <p>4.2.3 The site is not seeking to increase withdrawals because of the AWTP.</p>
<p><b>4.3 Maintain or improve site water quality:</b></p> <p>Meet the site's water quality targets. As noted in Criterion 3.2., where water quality stress is a shared water challenge, the site must also continually improve its effluent for the parameters of concern until best practices are met and work with relevant public sector agencies to address the imbalance and shared water challenge. Note: if a site wishes to increase its water use in a water stressed context, the site must cause no overall increase in the degradation of water quality in the catchment and degradation of the site's water source(s) and encourage relevant public sector agencies to address the unlawful water use contributing to the degradation in the catchment.</p>	<p>4.3.1 Measurement-based evidence showing that targets have been met</p> <p>4.3.2 (Water quality-stressed catchments only) Evidence of continual improvement or best practice</p> <p>4.3.3 (Sites wishing to increase effluent levels of water quality parameters of concern in water quality-stressed catchments only) Evidence of no net degradation in water quality in the catchment</p>	<p>4.3.1 Sampling done per the trade waste agreement (3 days of samples taken on consecutive days per month).</p> <p>Interview with Peter Banks. AWTP supervisor. August 2018 summary for trade waste discharge were within specification. WSP target was noncompliance and this has been met.</p> <p>4.3.2 The AWTP represents best practice in effluent management.</p> <p>4.3.3 Ingham's did not increase effluent levels in the reporting period but there were negotiations for the next period for an increase in effluent volume. However volumes remained the same with an option to increase in the future.</p> <p>This was confirmed in an interview with SE water Djukimodjo (Trade Waste Officer).</p>

<p><b>4.4 Maintain or improve the status of the site's Important Water-Related Areas:</b></p> <p>Meet the site's targets for Important Water-Related Areas at the site. As noted in Criterion 3.2., where Important Water-Related Area degradation is a shared water challenge, the site must also continually improve its Important Water-Related efforts until best practices are met, and the site must not knowingly cause any further degradation of such areas on site.</p>	<p><b>4.4.1 Documented evidence showing that targets have been met</b></p> <p><b>4.4.2 (Degraded Important Water-Related Area catchments only) Evidence of continual improvement or best practice</b></p>	<p><b>4.4. In 2018 there was a partnership with Conservations volunteers Australian to weed the tributary of Watson creek on the site.</b></p> <p>The target of maintaining healthy water ways was maintained.</p> <p>Stakeholders commented that they have not done any testing on the water since 2006. Ingham's do their own testing</p> <p>Obs There is an opportunity to share water testing results with the Watson Creek group.</p> <p><b>4.4 Watson Creek catchment (not necessarily on Ingham's site) is no longer considered degraded.</b></p>
<p><b>4.5 Participate positively in catchment governance:</b></p> <p>Continually coordinate and cooperate with any relevant catchment management authorities' efforts. As noted in Criterion 3.2, where water governance is a shared water challenge, the site must also continually improve its efforts until best practices are met.</p>	<p><b>4.5.1 Documented evidence of the site's ongoing efforts to contribute to good catchment governance</b></p> <p><b>4.5.2 (Weak water governance catchments only) Evidence of continual improvement or best practice</b></p>	<p><b>4.5.1 Documents show ongoing involvement as key partner in development of WPB/WS stakeholder workshops and consequent Watson Creek WS Project initiative.</b></p> <p>There has been little or no activity of WPB/WS stakeholder group. The WP Biosphere report card 2016/17 was evidence of continued engagement.</p> <p>See NCR 3.4.1 –In the absence of WPB/WS activity the site has not directly approach relevant authorities.</p> <p><b>4.5.2 This is not an area of weak water Governance.</b></p>
<p><b>4.6 Maintain or improve indirect water use within the catchment:</b></p> <p>Contact the site's primary product suppliers and water-related service providers located in the catchment and request that they take actions to help contribute to the desired water stewardship outcomes.</p>	<p><b>4.6.1 List of suppliers and service providers, along with the actions they have taken as a result of the site's engagement relating to indirect water use</b></p>	<p><b>4.6.1 Engagement is evident:</b></p> <p>Ingham's is part of the broad WPB/WS stakeholder workshop – especially Melbourne Water and SE Water engagement;</p> <p>Engagement has occurred with the breeder farms to collect information on water use. Evidence seen, spreadsheet of water readings from breeder farms and hatcheries from 2014 to 11/11/2017 this has been updated in 2018 and more data has been collected from the same (5) listed breeder farms and hatcheries). There are also farming sustainability meetings 2 monthly.</p> <p>Obs 2/18 The engagement record could be used to capture ongoing engagement with these groups.</p>
<p><b>4.7 Provide access to safe drinking water, adequate sanitation and hygiene awareness (WASH) for workers on-site:</b></p> <p>Ensure appropriate access to safe water, effective sanitation and protective hygiene for all workers in all premises under the site's control.</p>	<p><b>4.7.1 List of actions taken to provide workers access to safe water, effective sanitation and protective hygiene (WASH) on-site</b></p>	<p><b>4.7.1 A self-assessment exercise shows: For 2018</b></p> <ul style="list-style-type: none"> <li>• Amenities water is provided using the SE Water potable water supply.</li> <li>• There is a separate pumping and distribution system. A 1ML tank is held on site so that in event of supply failure there will be a period of usage available until supply can be re-established.</li> <li>• Staff have regular training, tool-box talks and other activity</li> </ul>

		emphasising hygiene especially as it relates to food safety but also to their own personal protection from infection.
<p>4.8 Notify the owners of shared water-related infrastructure of any concerns:</p> <p>Contact the owners of shared water-related infrastructure and actively highlight any concerns the site may have in light of its risks and shared water challenges.</p>	<p>4.8.1 List of individuals contacted and key messages relayed</p>	<p>4.8.1</p> <p>Ingham's have constant contact with SE water over trade waste and supply.</p> <p>Interview with David Djukimodjo (Trade Waste Officer) south east water.</p> <p>Ingham's take seriously the acceptance criteria in the contract. SE water Needs to understand the plant and getting early warning if things may change eg increased output. This helps with planning for maintenance of SE W infrastructure. There have been consultation about possible increase in production on the site and the impact on SE water infrastructure.</p>

### Advanced criteria

Note: the guidance notes in the AWS standard should be used in evaluating compliance to the criterion and indicators.

Advanced Criteria	Indicators	Response area
<p>4.9 Achieve best practice results on site water balance:</p> <p>Achieve best practice results with respect to the site's water balance targets as informed by stakeholder consensus or industry specific benchmarks.</p>	<p>4.9.1 Quantified improvement in water balance from site-set baseline date</p> <p>4.9.2 Evidence showing that actions meet best practice expectations</p>	<p>4.9.1 The AWTP is unique and there is no world benchmark for its operation but <i>currently</i> in excess of 70% of water is recycled in the process. In 2018 73%</p> <p>Figures show significant reduction in water purchased from SE Water compared to pre AWTP commissioning.</p> <p>AWTP water recycling metrics – significant water purchase reduction since commissioning.</p> <p>Data over 3 years of operation showing water recycling targets met and improving.</p> <p>Measurements of water balance are now part of a real time monitoring system with daily monitoring against the annual target (of 5% reduction).</p> <p>There is a new project to improve recycled water recovery by pre heating the anaerobic ponds to improve Anerobic digestion from 51% to 75 % in cooler weather.</p> <p>4.9.2 A letter from SE Water Indicates stakeholder recognition of best practice in site water balance. There has been no additional recognition in the 2018 year.</p> <p>8 Points</p>
<p>4.10 Achieve best practice results on site water quality:</p> <p>Achieve best practice results with respect to the site's water quality targets as informed by stakeholder consensus or industry-specific benchmarks.</p>	<p>4.10.1 Quantified improvement in water quality from site-set baseline date</p> <p>4.10.2 Evidence showing that actions meet best practice expectations</p>	<p>4.10.1 Again the AWTP impacts on water quality improvement and represents best practice. Because the plant is unique the only expected base line is in the plant design report.</p> <p>Figures show that trade waste agreement and consent targets are being exceeded.</p>

		<p><b>4.10.2 A letter from SE Water Indicates stakeholder recognition of best practice in site water quality.</b></p> <p><b>8 points</b></p>
<p><b>4.11 Achieve best practice results on Important Water-Related Areas through restoration:</b></p> <p><b>Achieve best practice results with respect to the site's Important Water-Related targets and complete restoration of non-functioning or severely degraded Important Water-Related Areas as informed by stakeholder consensus or credible expert opinion.</b></p>	<p><b>4.11.1 Evidence of completed restoration of non-functioning or severely degraded Important Water-Related Areas</b></p> <p><b>4.11.2 Evidence showing that actions meet best practice expectations</b></p>	<p>4.11.1 At the initial audit (see below) the water catchment expert confirmed that the baseline situation was that the Watson Creek was biologically dead due to raw effluent discharge (not necessarily from Inghams). Watson Creek is no longer considered degraded.</p> <p>Water quality improvements are demonstrated at Watson Creek tributary from WSRL projects</p> <p>The WSRL project was undertaken to restore Watson Creek. The initial project is now complete but has been extended due to additional grant monies to add 500 bankside plants.</p> <p>This planting was completed in 2017 There was additional planting in 2018 on a tributary.</p> <p>Stakeholder confirm the health of the creek is good and that vulnerable species like the Dwarf Galaxia <u>Galaxiella pusula</u> have been noted in the creek. This is a biotic indicator of water quality and health.</p> <p>Because of this the local authority have stopped dredging.</p> <p>4.11.2 Evidence of completion and stakeholder acknowledgement includes:</p> <p>Western Port Biosphere report card 2016-2017</p> <p>Contact with stakeholders in the 2018 auditor 360 degree stakeholder report includes stakeholder acknowledgement of the contribution of Ingham's to Important water related areas.</p> <p>In 2015 The catchment expert advised</p> <p><i>4.11 - Health of Watsons Creek: Water quality and the biological condition of Watsons Creek have long been seen as very poor. In the 1980s there were major impacts from effluent discharges (EPA 1988). An extensive assessment of rivers and streams in the Western Port catchment undertaken by EPA in the mid 1990s (EPA 1998) found Watsons Creek to very poor ecological condition, indeed, out of 34 it was rated as one of the poorest five. Similar findings were found in the late 1990s in a report to Melbourne Water (AWT 1998). A more recent study (2008) again found that water quality and biological health were compromised (Elgin 2008). All of these studies suggest that the poor ecological health to primarily due to nutrients, and to a lesser extent, sediment entering the creek and resulting in</i></p>

		<p><i>excessive plant growth and low dissolved oxygen levels. The sources of nutrients and sediment are usually attributed to bed and bank in stability and increasing urbanisation.</i></p> <p><i>References:</i>  <i>Elgin (2008). Watsons Creek water quality monitoring. Report prepared by Elgin for the Mornington Peninsula and Western Port Biosphere Reserve Foundation.</i>  <i>EPA (1988). The impact of poultry abattoir waste on Watsons Creek, Mornington Peninsula. EPA Publication no. SRS 88/011.</i>  <i>EPA (1998). Environmental health of streams in the Western Port catchment. EPA publication no. 600.</i>  <i>AWT (1998). Waterway assessment in the western port catchment - The environmental health of western port peninsula streams. AWT report no. 267/98</i></p> <p>There was a 2015 (December) project by Dr Jackie Myers to access Watson creek for toxicants.</p> <p>8 Points</p>
<p><b>4.12 Achieve best practice results and strengthen capacity in water governance:</b></p> <p><b>Achieve best practice results with respect to the site's water governance targets, including transparently strengthening governance capacity, as informed by stakeholder consensus and public-sector leadership recognition.</b></p>	<p><b>4.12.1 List of efforts to positively engage and strengthen water governance capacity from a site-set baseline date</b></p> <p><b>4.12.2 Evidence showing that actions meet best practice expectations</b></p>	<p>4.12.1 There are examples of efforts to engage that have benefited water governance, but there is no list of these efforts</p> <p>4.12.2 There is evidence of stakeholder approval from minutes of ongoing engagement with the Western Port Biosphere Foundation. Western Port Biosphere presented Inghams with a Water Stewardship award on 16<sup>th</sup> November 2017</p> <p>There is no real activity from these groups in 2018</p> <p>Criterion not met</p>
<p><b>4.13 Advance regionally specific industrial water-related benchmarking:</b></p> <p><b>Contribute to or participate in the development of regionally specific industrial water-related benchmarking and spreading best practices.</b></p>	<p><b>4.13.1 List of efforts to contribute to regionally specific benchmarking and spread best practices</b></p>	<p><b>Not assessed</b></p>
<p><b>4.14 Re-allocate saved water for social or environmental needs:</b></p> <p><b>Ensure that any water saved by the site's actions under 4.2 is voluntarily re-allocated for social or environmental purposes that are recognized needs in the catchment.</b></p>	<p><b>4.14.1 Total volume of water officially re-allocated for social and environmental needs (in m3 or Mm3)</b></p> <p><b>4.14.2 Documentation of legal contracts for the reallocation of water to social or environmental needs</b></p>	<p><b>Not assessed</b></p>
<p><b>4.15 Engage in collective action to address shared water challenges:</b></p> <p><b>Work with other interested entities in the catchment to advance or improve water stewardship outcomes. For the additional recognition (6 points), quantifiably</b></p>	<p><b>4.15.1 List of collective action efforts, including a description of the role played by the site</b></p> <p><b>4.15.2 Quantified improvement in outcome(s) or shared water challenge(s) from site-set baseline date</b></p>	<p><b>4.15.1 • WPB Watson Creek project underway (year one of three-year plan)</b>  <b>• Project Completed</b></p> <p><b>There is continued work with the catchment group.</b></p>

<p>improve the shared water challenge and be recognized by stakeholders as having played a material role in the improvement.</p>	<p>4.15.3 (For extra points only) Stakeholder-based evidence recognizing that the site played a material role in the improvement</p>	<p>There is a new partnership with conservation Volunteers Australia with one event completed and a second planned. Engaged Peninsular bush works for replanting.</p> <p>Engaged with VicRoads on a study to identify fauna in the Watson creek area (Identification of potential conservation values)</p> <p>4.15.2 Improvements shown in:</p> <ul style="list-style-type: none"> <li>Ingham's closing project summary dated 14 Nov 2014.</li> <li><a href="#">You tube video</a> presenting the project.</li> <li>E mail to group members and stakeholders approving the grant for the project (MPLN e mail re WSRL grant 17 Nov 2014)</li> </ul> <p>Ongoing Ingham's monitoring on Watson creek shows improvements in the areas adjacent to the plant.</p> <p>The 2018 weed clearing project mapped out the works done and the improvements in terms of weeds cleared.</p> <p>4.15.3 Interviews with stakeholders in 2018 audit shows stakeholders recognize that the site played a material role in the improvements.</p> <p>An award in 2017 from the Western Port Biosphere group, which is stakeholder driven, also indicated stakeholder acknowledgement <a href="http://mpnews.com.au/2017/11/28/water-awards-for-meat-and-vege-producers/">http://mpnews.com.au/2017/11/28/water-awards-for-meat-and-vege-producers/</a></p> <p>14 Points</p>
<p>4.16 Drive reduced indirect water use throughout the site's supply chain and outsourced water-related service providers:</p> <p>Contact the site's primary product suppliers and water-related service providers located outside the site's catchment and request they take actions to help contribute to the desired water stewardship outcomes in their catchments. For the additional recognition (2 points), quantify the improvements that the site's intervention generated and be recognized by the site's supplier as having played a material role in prompting that improvement.</p>	<p>4.16.1 List of suppliers with details on engagement efforts</p> <p>4.16.2 Quantified improvement by the supplier as a result of this engagement</p> <p>4.16.3 (For extra points only) Supplier-based evidence recognizing that the site played a material role in prompting the change</p>	<p>Not assessed</p>
<p>4.17 Complete implementation of water-related initiatives:</p> <p>Complete implementation of one or more of the initiatives committed to in 1.4.</p>	<p>4.17.1 Appropriate documentation or evidence of completion of initiative</p>	<p>4.17.1 Evidence sighted includes:</p> <ul style="list-style-type: none"> <li>AWTP is operational</li> <li>Signed 2001 agreement Watson Creek agreement June 2007 on <a href="http://www.biosphere.com">www.biosphere.com</a> project completed. There has now been an extension to this project due to increased funding.</li> </ul>



		<p>In 2018 it was noted that there is a proposal for a new project to improve anaerobic digestion by use of methane to increase water temperature by 6 degrees in cold weather this would in turn improve efficiency from 51% to 75%</p> <p>This is not yet complete so cannot be assessed</p> <p>3 Points</p>
<p><b>4.18 Provide access to safe drinking water, adequate sanitation and hygiene awareness offsite:</b></p> <p>In coordination with relevant public authorities, directly assist in the provision of appropriate access to safe drinking water, adequate sanitation and hygiene awareness for individuals off-site within the catchment.</p>	<p><b>4.18.1 List of actions taken to provide catchment stakeholders with access to off-site access to safe drinking water, adequate sanitation and hygiene awareness.</b></p>	Not assessed

## Step 5 – EVALUATE

Step 5 is intended to review performance against the actions taken in Step 4, learn from the outcomes – both intended and unintended – and inform the next iteration of the site’s water stewardship plan. The expectation is that such an evaluation takes place at least annually, with more frequent evaluation encouraged as feasible.

### Core criteria

Note: the guidance notes in the AWS standard should be used in evaluating compliance to the criterion and indicators.

Core Criteria	Indicators	Response Area
<p><b>5.1 Evaluate the site’s water stewardship performance, risks and benefits in the catchment context:</b></p> <p>Periodically review the site’s performance in light of its actions and targets from its water stewardship plan to evaluate:</p> <ul style="list-style-type: none"> <li>General performance in terms of the water stewardship outcomes (considering context and water risks), positive contributions to the catchment, and water-related costs and benefits to the site.</li> </ul>	<p><b>5.1.1 Post-implementation data and narrative discussion of performance and context (including water risk)</b></p> <p><b>5.1.2 Total amount of water-related costs, cost savings and value creation for the site based upon the actions outlined in 3.2 (drawn from data gathered in 2.4.6)</b></p> <p><b>5.1.3 Updated data for indicator 2.4.7 on catchment shared value creation based upon the actions outlined in 3.2</b></p>	<p><b>5.1.1 Water risk assessments updated I the Water Stewardship plan. 3.2 of plan shows achievements 2018</b></p> <p>Obs 3/18 there is evidence of small adaptive management steps eg more training as a result of evaluation. There are numerous other examples that can be brought in eg life cycle data and climate change resilience, and the evidence of Dwarf Galaxia in the creek that may impact on the plan.</p> <p><b>5.1.2 2.4.6 of the plan details water Related costs, savings and value creation.</b></p> <p><b>5.1.3 Data for Shared value creation has been updated as 2.7 of the water Stewardship Plan.</b></p> <p>Obs 4/18 updates from previous version could be dated to show they are current.</p>
<p><b>5.2 Evaluate water-related emergency incidents and extreme events:</b></p> <p>Evaluate impacts of water-related emergency incidents (including extreme</p>	<p><b>5.2.1 Documented evidence (e.g., annual review and proposed measures)</b></p>	<p><b>5.2.1 No water-related emergency incidents have occurred since the plant was commissioned in 2012. This was reconfirmed in 2017.</b></p>

<p>events), if any occurred, and determine effectiveness of corrective and preventive measures. Factor lessons learned into updated plan.</p>		<p>Any incidents are filed in the Incident reports. An example was viewed – There is a new incident report format Environmental incident fact sheet this leads to the record of the incident through the process of review.</p> <p>This is recorded on a register by site and incident type so that incident can be filtered and targeted review and corrective actions.</p> <p>At the time of the 2018 audit it confirmed there have been two incidents in the audit period, one reported through the OHS system as an environmental incident and the second reported as a Hazard Report as it included citric acid.</p> <p>Clean up measures were reviewed each of the two incidents and confirmed as adequate</p>
<p><b>5.3 Consult stakeholders on water-related performance:</b></p> <p>Request input from the site's stakeholders on the site's water stewardship performance and factor the feedback/lessons learned into the updated plan.</p>	<p><b>5.3.1 Commentary by the identified stakeholders</b></p>	<p><b>5.3.1 The data from 2018 has been presented at the Watson Creek catchment group meeting's 13 April 2018 and other meetings.</b></p> <p>There have been no WPB meetings but conversations with Lance Lloyd have taken place.</p> <p>Refer also NCR 01. Because of the lack of activity, the opportunity to talk to stallholders have been limited.</p> <p>Results are also submitted to SE water by regular regulatory reporting and associated meetings.</p> <p>Obs 5/18 Stakeholder engagement is informal. There is an opportunity to formally present results at an appropriate meeting and record stakeholder input.</p>
<p><b>5.4 Update water stewardship and incident response plans:</b></p> <p>Incorporate the information obtained into the next iteration of the site's water stewardship plan. Note: updating does not apply for initial round of Standard implementation.</p>	<p><b>5.4.1 Modifications to water stewardship and incident response plans incorporating relevant information</b></p>	<p><b>5.4.1 The emergency response incident plan is in ss 4.6.6 of the EMP and is up to date. The EMP is referenced in the WSP.eg ss 9 surface water management plan,</b></p> <p>Interviewed the OHS Manager in relation to the EMP and updates to Incident Response Register as a result of the incidents recorded in the audit period. Reviewed the Risk Assessment dated 29/6/18 and also reviewed the Corrective Action Request Form seen dated 29/6/18 which set steps to include the results of the incidents into relevant documents.</p>

## Advanced criteria

Note: the guidance notes in the AWS standard should be used in evaluating compliance to the criterion and indicators.

Advanced Criteria	Indicators	Response Area
<p>5.5 Conduct an executive or governance body-level review of water stewardship efforts:</p> <p>Review the site's water stewardship performance, impacts and risks with either the organization's executive team (CEO/CFO or equivalent) or board (or equivalent).</p>	<p>5.5.1 Agenda and minutes of executive team or governance body meeting noting water stewardship discussion</p>	<p>5.5.1 The Ingham's Board has considered Water Stewardship and included it as one of four elements in the Business Sustainability Group. The Board has not considered the outcome of a formal review as this has not yet occurred. Minutes of the Extended Leadership Team meeting of 21-23 September 2015 demonstrate that water stewardship was discussed.</p> <p>Evidence, Details in both the 2017 and 2018 Chairman's Report and Annual Report preparation, review and approval process.</p> <p>3 points</p>
<p>5.6 Conduct a formal stakeholder evaluation:</p> <p>Undertake a formal review with the site's stakeholders on the site's efforts to address shared water challenges. This includes reviewing the site's contributions to maintaining good governance, adequate flows for all needs, good water quality status and functioning Important Water-Related Areas, and soliciting suggestions for continuous improvement.</p>	<p>5.6.1 Documentation of formal stakeholder evaluation with recommendations for updated Criterion 3.5</p>	<p><b>Not assessed</b></p>

## Step 6 – COMMUNICATE & DISCLOSE

Step 6 is intended to encourage transparency and accountability through communication of performance relative to commitments, policies and plans. Disclosure allows others to make informed decisions on a site's operations and tailor their involvement to suit.

### Core criteria

Note: the guidance notes in the AWS standard should be used in evaluating compliance to the criterion and indicators.

Core Criteria	Indicators	Response Area
<p>6.1 Disclose water-related internal governance:</p> <p>Publicly disclose the general governance structure of the site's management, including the names of those accountable for legal compliance with water-related laws and regulations.</p>	<p>6.1.1 Disclosed and publicly available summary of governance at the site, including those accountable for compliance with water-related laws and regulations</p>	<p><b>GL</b></p> <p>6.1.1 The public commitment is this disclosure and is in the public domain. It identified the Plant manager and CEO as those with responsible for compliance with water related areas.</p> <p>The Environmental Management Plan identifies the roles and responsibilities within the company structure (Tables 4.1, 4.2) and the individuals responsible (Table 4.3).</p> <p>Reviewed at the 2018 audit confirming the commitment statement is available on the website and was reviewed by the auditor.</p>

		<p>Also verified that the Site Commitment document is endorsed by CEO Mick McMahoan updated and signed by the new plant manager Gerard Segrave (Nov 2017), the document is publicly available at:  <a href="http://s3-ap-southeast-2.amazonaws.com/ingham/wp-content/uploads/2017/11/14192241/Water-Stewardship-Site-Commitment-Statement-2.pdf">http://s3-ap-southeast-2.amazonaws.com/ingham/wp-content/uploads/2017/11/14192241/Water-Stewardship-Site-Commitment-Statement-2.pdf</a></p> <p><b>NCR 02/2018: The summary of the governance document is available at the site but is not publicly available</b></p>
<p><b>6.2 Disclose annual site water stewardship performance:</b></p> <p>Disclose the relevant information about the site's annual water stewardship performance, including results against the site's targets.</p>	<p><b>6.2.1 Disclosed summary of site's water stewardship results</b></p>	<p>6.2.1 Since the last audit there has been an annual report of the business sustainability section.</p> <p>Reviewed the Efforts to Address Shared Water Challenges and Progress– Ingham's Somerville, dated 9 November 2018. This meets the criteria.</p>
<p><b>6.3 Disclose efforts to address shared water challenges:</b></p> <p>Publicly disclose the site's shared water challenges and report on the site's efforts to help address these challenges, including all efforts to engage stakeholders and coordinate and support public-sector agencies.</p>	<p><b>6.3.1 Disclosed and publicly available description of shared challenges and summary of actions taken to engage stakeholders (including public-sector agencies)</b></p>	<p><b>6.3.1 Evidence of shared water challenges address cooperatively with stakeholders was provided as part of the stakeholder list.</b></p> <p>Reviewed the Efforts to address Shared Water Challenges and Progress– Ingham's Somerville dated 9 November 2018. This is adequate for purpose. The auditors also reviewed the Stakeholder Register which also includes actions taken to engage stakeholders</p>
<p><b>6.4 Drive transparency in water-related compliance:</b></p> <p>Make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences. Note: any site-based violation that can pose an immediate material threat to human or ecosystem health from use of or exposure to site-related water must be reported immediately to relevant public agencies.</p>	<p><b>6.4.1 Available list of water-related compliance violations with corresponding corrective actions</b></p>	<p>6.4.1 No water-related compliance violations have occurred at the site since the last audit. Provisions for reporting compliance violations are contained within the procedures for Incident Reporting, Incident Response and Incident Reporting Investigation (doc 4.03.01).</p> <p>The EMP now adequately describes how compliance violations would be disclosed if required in the preventative and corrective actions section of the EMP sections 4.66 and 4.7</p> <p>No compliance violations in the audit period- this was also confirmed by SE Water during stakeholder consultations.</p>
<p><b>6.5 Increase awareness of water issues within the site:</b></p> <p>Strive to raise the understanding of the importance of water issues at the site through active communications.</p>	<p><b>6.5.1 Record of awareness efforts (dates and communication) and, if possible, level of awareness</b></p>	<p>6.5.1 There is ample evidence of efforts to raise awareness of Water Stewardship:</p> <ul style="list-style-type: none"> <li>• Information is posted on the sites Internet and Intranet (viewed)</li> <li>• The site's commitment to Water Stewardship is available on the Ingham intranet to staff and relevant management and staff are aware of the policy.</li> <li>• The outcomes of the Watson Creek project was communicated at the AGM 2016.</li> <li>• Water Stewardship is included in the Environmental Management Plan, and activities on site (e.g. Landcare) have been notified to staff by email</li> <li>• Relevant staff have Key Performance Indicators around water stewardship.</li> </ul>

		<p>A toolbox talk has been given to all staff between March and October 2018 discussing water stewardship and the need to save water, keeping wastes and solids out of the drains and hosing of external areas into stormwater drains should be avoided, reporting any leaks and malfunctioning equipment, using dry cleaning techniques where possible and ensuring equipment is operated correctly.</p> <p>Records of these toolbox talks were reviewed by the auditor.</p>
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### **Advanced criteria**

Note: the guidance notes in the AWS standard should be used in evaluating compliance to the criterion and indicators.

<b>Advanced Criteria</b>	<b>Indicators</b>	<b>Response Area</b>
<p><b>6.6 Disclose water risks to owners (in alignment with recognized disclosure frameworks):</b></p> <p>Disclose the site's material water risks to owners with additional recognition if it is done according to a recognized global disclosure framework.</p>	<p><b>6.6.1</b> Written evidence of site-based material water risk information conveyed to owners</p> <p><b>6.6.2 (For extra points only)</b> Disclosure to owners in a format that is consistent with the requirements of a recognized disclosure framework</p>	<b>Not assessed</b>
<p><b>6.7 Implement a programme for water education:</b></p> <p>Implement a water education programme within the catchment to raise awareness and understanding of water stewardship issues and practices.</p>	<b>6.7.1</b> Description of water-related education programme	<b>Not assessed</b>
<p><b>6.8</b> Discuss site-level water stewardship in the organization's annual report:</p> <p>Explicitly mention the site's efforts to implement AWS in its organization's annual report, including referencing the benefits to the site and stakeholders.</p>	<b>6.8.1</b> Page number of annual report containing site based AWS reference	<p>6.8.1</p> <p>The auditor reviewed the 2018 Annual Report (pages 14 and 15) states the efforts to implement the AWS on this site and included comments by the Chairman of the Global Alliance for Water Stewardship</p> <p>2 points</p>

**END OF REPORT**