Alliance for Water Stewardship

Site Level

CONFIDENTIAL

Client Name:	Ingham's Enterprises Pty Ltd
Audit date(s):	28/11/2019
Audit location:	Grant Road, Somerville, VIC 3912
Audit report completed by:	Kevin OGrady
Report issue date:	This is the date that the report is issued to the client
Proposed date of next audit:	28/11/2020

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, 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.

The current AWS Standard is Version 2.0 launched on 22nd March 2019.

Disclaimer

The BM TRADA audit was based on a sampling approach and therefore non conformities 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 of 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 response 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.

All major non-conformities must satisfactorily address by the client within thirty **(30)** days.

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.

All minor non-conformities must satisfactorily address by the client within thirty **(90)** days unless an alternative timeframe, supported by written justification, has otherwise been agreed with the CAB.

2.9.3 For certificate holders, the CAB shall require that minor non-conformities are satisfactorily addressed within ninety **(90)** days

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.

All other finding that are not major or minor non – conformities can be raised as observations.

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.

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.

Note: non-conformity will hereinafter be referred to as NCR.

1. Client and Certificate Details

Client & Site Details

Address of certified operation:	Grant Road, Somerville, VIC 3912
Management representative:	Boram Keam (Greg Menz has recently left and will be replaced)
Contact email address:	bkeam@inhams.com.au
Contact phone number:	+64212409878
Website address:	www.inghams.com.au

BM TRADA Certificate Details

Type of certificate holder:	Single Site		
Certificate Number:	AWS-01.0-INT-BMT-00-07-0002-0002	**Date of first certification:**	24 November 2015
Current Certificate start date:	24 November 2018	**Current Certificate expiry date**	23 November 2021
Contact phone number:	+64212409878		
Website address:	www.inghams.com.au		

2. Details of Audit and Scope of Certification

Audit Details

Audit type:	Initial		Surveillance	X	Scope Extension		

Audit team and roles:	Kevin O'Grady Lead Auditor David Tiller Catchment specialist not on site
Standard:	The AWS International Water Stewardship Standard Version V 2.0 (March 2019)

Scope of Certification

Scope of Certification:	Platinum Level certification of Water Stewardship in the slaughter and processing of poultry.
Operations covered by scope of certification:	Slaughter and processing of poultry.
Other certification scheme(s) this company is certified for:	AQIS

Outsourcing:
Does the client outsource operations or activities within the scope to independent third parties? *

*Activities of suppliers to the operation are not considered outsourcing.

3. Executive Summary

Main Items / Critical Control Points / Places Inspected

Main items / Critical Control Points / Places inspected (including names & affiliations of people consulted	Number of NCRs
Gather and Understand	0
Commit and Plan	0
Implement	0
Evaluate	0
Communicate and Disclose	0
Total number of nonconformities issued at this audit:	0

Previous NCR(s)

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

Allocation of points and Lead Auditor Recommendations

1.4.3
The embedded water use of primary inputs in catchment(s) of origin shall be quantified
7
1.5.8
Efforts by the site to support and undertake catchment level water-related data collection shall be identified
7
Range of possible points based on degree of effort
1.5.9
The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified
Nil
1.6.3
Future water issues shall be identified, including anticipated impacts and trends
3

1.6.4
Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water
NIL
STEP TWO
2.1.2
A statement that explicitly covers all requirements set out in Indicator 2.1.1 and is signed by the organization's senior-most executive or governance body and publicly disclosed shall be identified
1
2.3.3
The site's partnership/water stewardship activities with other sites within the same catchment (which may or may not be under the same organizational ownership) shall be identified and described
4
2.3.4
The site's partnership/water stewardship activities with other sites in another catchment(s) (either under same corporate structure or with another corporate site) shall be identified
4
2.3.5
Stakeholder consensus shall be sought on the site's water stewardship plan. Consensus should be achieved on at least one target. A list of targets that have consensus and which stakeholders are involved shall be identified
7
2.4.2
A plan to mitigate or adapt to water risks associated with climate change projections developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified
6
STEP THREE
3.1.3
Evidence of improvements in water governance capacity from a site-selected baseline date shall be identified
NIL
3.1.4
Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the good water governance of the catchment shall be identified
2
3.3.4
The total volume of water voluntarily re-allocated (from site water savings) for social, cultural and environmental needs shall be quantified
NIL
3.5.2
Evidence of completed restoration of non-functioning or severely degraded Important Water-Related Areas including where appropriate cultural values from a site-selected baseline date shall be identified. Restored areas may be outside of the site, but within the catchment
6
3.5.3
Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the healthy status of Important Water-Related Areas in the catchment shall be identified
2
3.6.3
A list of actions taken to support the provision to stakeholders in the catchment of access to safe drinking water, adequate sanitation and hygiene awareness shall be identified
NIL
3.6.4
In catchments where WASH has been identified as a shared water challenge, evidence of efforts taken with relevant public-sector agencies to share information and to advocate for change to address access to safe drinking water and sanitation shall be identified
NIL
3.7.3

Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated
5 (work has commenced to quantify embedded water but reduction has not yet been archived)
3.9.6
Achievement of identified best practice related to targets in terms of good water governance shall be quantified
8
3.9.7
Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified
8
3.9.8
Achievement of identified best practices related to targets in terms of water quality shall be quantified
8
3.9.9
Achievement of identified best practices related to targets in terms of the site's maintenance of Important Water-Related Areas have been implemented
8
3.9.10
Achievement of identified best practice related to targets in terms of WASH shall be quantified
NIL
3.9.11
A list of efforts to spread best practices shall be identified
3
3.9.12
A list of collective action efforts, including the organizations involved, positions of responsible persons of other entities involved, and a description of the role played by the site shall be identified
9 (limited to 1 or 2 projects)
3.9.13
Evidence of the quantified improvement that has resulted from the collective action relative to a site-selected baseline date shall be identified and evidence from an appropriate range of stakeholders linked to the collective action (including both those implementing the action and those affected by the action) that the site is materially and positively contributing to the achievement of the collective action shall be identified
6 Limited to only one or 2 projects
STEP FOUR
4.1.4
A governance or executive-level review, including discussion of shared water challenges, water risks, and opportunities, and any water-related cost savings or benefits realized, and any relevant incidents shall be identified
NIL
4.3.2
The site's efforts to address shared water challenges shall be evaluated by stakeholders. This shall include stakeholder reviewing of the site's
NIL
efforts across all five outcome areas, and their suggestions for continual improvement
STEP FIVE
5.3.2
The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report
1
5.3.3
Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report
1

Total 81 points

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 and Catchment

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 from a number of points. Blood is captured in a stainless steel trough that drains to a storage tank. A de-feathering unit mechanically removes feathers from the birds. Heads, feet and viscera (internal organs) are also mechanically removed before the birds are washed internally and externally with chlorinated water, and then chilled to a required temperature. Birds are weighed and graded and sent either to the cutting, boning or packing areas for processing. The feathers, heads, feet and viscera are transported to separate holding tanks. There is now a joint venture producing pet food ingredients plant on site.
The plant processes chicken for human consumption and generates secondary products for use in animal feed and pet food manufacturing.
An advanced water treatment plant (AWTP) was constructed as part of the fire rebuild. The AWTP recovers in excess of 70% of the total water used on site and recycles it for reuse in the factory as wash water.

In 2019 a new spin chiller was introduced to unlock more processing potential. This has not had any effect on water usage.

<u>Catchment</u>

A large proportion of the municipal supplied water comes from protected or uninhabited mountain ash forests high in the Yarra Ranges, east of Melbourne, where more than 157,000 hectares have been reserved for the primary purpose of harvesting water. These water supply catchments were set aside more than 100 years ago to supply high quality water that requires

minimal treatment. The catchments are managed by Melbourne Water and Parks Victoria. Melbourne is one of five major cities in the world that has protected catchments.

From the uppermost catchments, water flows into the Thomson and Upper Yarra reservoirs, where water may be stored for many years before being used. Holding the water for a long period allows the sediments from the forests, washed in by the rain, to settle, providing natural purification. Water from the upper reservoirs is then transferred to Silvan and Cardinia reservoirs.

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 contaminates, 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.

Notes on Watson Creek

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 it 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.

STEP 1: GATHER AND UNDERSTAND
Gather data to understand shared water challenges and water risks, impacts and opportunities

Intent: To ensure that the site gathers data on its water use and its catchment context and that the site uses these data to understand its shared water challenges as well as its contributions (both positive and negative) to these challenges, water risks, impacts, and opportunities. This information also informs the development of the site's water stewardship strategy and plan (Step 2) and guides the actions (Step 3) necessary to fulfil the site's commitments.

Criteria		Indicators	Response Area
1.1 Gather information to define the site's physical scope for water stewardship purposes, including: • its operational boundaries; • the water sources from which the site draws; • the locations to which the site returns its discharges; • the catchment(s) that the site affect(s) and upon which it is reliant.	1.1.1	The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including: Site boundaries; Water-related infrastructure, including piping network, owned or managed by the site or its parent organization; Any water sources providing water to the site that are owned or managed by the site or its parent organization; Water service provider (if applicable) and its ultimate water source; Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies; Catchment(s) that the site affect(s) and is reliant upon for water.	A map of the site's boundaries is included in the document "Environmental Management Plan Somerville – and the Water stewardship plan. August 2019. The intention is for the Water Stewardship Plan to become the definitive document. The proposed biodiversity layers have still not yet been added. Water effluent points shown on maps. Catchment maps were seen with water coming from the SE Water Supply System. The Water Stewardship Plan is dated August 2019 The name and location of water sources is described in the Water Stewardship Plan and includes the South East Water maps of water sources which were viewed and are now part of the updated Water Stewardship Plan . The Water Stewardship Plan now describes 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 '

			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 Water Stewardship Plan with links to data sources.
1.2 Understand relevant stakeholders, their water related challenges, and the site's ability to influence beyond its boundaries.	1.2.1	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; Provide evidence of stakeholder consultation on water-related interests and challenges; Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; Identify the degree of stakeholder engagement based on their level of interest and influence.	The "Water Stewardship Stakeholder List" contains a list of stakeholders, engagement and shared water challenges and is now incorporated into the Water Stewardship Plan 2019. The process for stakeholder consultation remains the same as before. Regular stakeholder meetings occurs around issues such as Watson creek. The Stakeholder list contains no new stakeholders. However a study by Major Roads Victoria "Targeted Dwarf Galaxia survey in Watson creek associated with proposed road works in Golf Links and Grant Road Baxter" was sought and it was agreed to share the data with the Watson creek Group (possible advanced criteria). This showed the fish population had improved and went to monitoring the IWRA. Stakeholder list being included in the Water Stewardship Plan. Neighbours are now included in the stakeholder list and indigenous stakeholders are also identified (Bunurong land council) showing contact this year in October and November on cultural impacts of weeding and replanting. This was confirmed in the auditor 360 exercise.
	1.2.2	Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.	The Stakeholder List contains a list of stakeholder's abilities to influence or be influenced. The site's Stakeholder list describes the sites sphere of influence. The list covers stakeholders across the entire catchment.
	1.3.1	Existing water-related incident response plans shall be identified.	The Water Stewardship Plan (Water Stewardship Plan) links to the Incidence

1.3 Gather water-related data for the site including: • water balance • water quality, • important Water Related Areas • water governance • WASH; • water-related costs, revenues, and shared value creation.			response plan for the site was reviewed in 2018 V7 (on a 3 year revision cycle) The site has an Emergency Response Procedure (3.11 – Emergency Preparedness and response) includes spills, leakages etc hazardous substances, and leads to sub documents which detail actions to specific circumstances The spreadsheet "SDS June 2019 DG Haz Substances (inspected)" contains a comprehensive register and inventory of chemicals used at the site. It now also identifies water-related chemicals, those that are possible sources of pollution, and where they are stored on site.
	1.3.2	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped.	The Water Stewardship Plan shows a Map for water balance (Inspected) this is coded for different areas and use 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 through to reviews of annual and historical data across any date or time range.
	1.3.3	Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.	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 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 Since Good water balance is a key challenge This site has also water use KPIs reported daily at operational meetings. Any variance on a day to day basis is investigated.
	1.3.4	Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be	The "AWTP Ingham's Somerville Results Master" spreadsheet contains water quality

	quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.	measurement data as specified in the Trade Waste Agreement with South East Water. Records up to 11 November 2019 were viewed. This included quality data vs targets in the Watson creek which is an identified shared water challenge. The limits don't change but seasonal high low variations are observed.
1.3.5	Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.	Inspected the spreadsheet "SDS October 2019DG Haz Substances" contains a comprehensive register and inventory of chemicals used at the site. It now also identifies water-related chemicals, those that are possible sources of pollution, and where they are stored on site. A spill risk assessment last done 29 June 2018 is also conducted as part of the Environmental management plan.
1.3.6	On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.	The Water Stewardship Plan contains a list and map of Important Water Related Areas. Indigenous cultural significance the Cumbungi swamp was investigated but is located just outside the company boundary with Watson Creek in the update of the Plan. Recent updates include new information currently being gathered on salinity in Watson Creek to confirm that it does not originate from the site. 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.
1.3.7	Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.	Inspected the Water Stewardship Plan which has extensive data on the water-related costs and revenues for the site and catchment

			These have been updated to include social and environmental values of the site to the catchment. Observation: A simple social impact assessment may assist in developing and monitoring social and environmental values and create a score card for monitoring. This would also qualify for advanced point
	1.3.8	Levels of access and adequacy of WASH at the site shall be identified.	WASH is not an unmet need. The site has done a risk assessment (RA201811107) to ensure workplace amenities comply with Worksafe Victoria codes.

1.4 Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.	1.4.1	The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.	Broiler farms, which are the primary input to 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 There is now an LCA tool including water use impact. This will lead to an LCA update 6 monthly on embedded water for all inputs regardless of if they are in catchment or out of catchment inputs. 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 by the Sustainability Team at Ingham's.
	1.4.2	The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.	The Water Stewardship Plan lists 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; There is now an LCA tool including water use impact. This will lead to an LCA update 6 monthly on embedded water for all inputs regardless of if they are in catchment or out of catchment inputs.
	1.4.3	**Advanced Indicator** The embedded water use of primary inputs in catchment(s) of origin shall be quantified.	There is now an LCA tool including water use impact. This will lead to an LCA update 6 monthly on embedded water for all inputs regardless of if they are in catchment or out of catchment inputs.
1.5 Gather water-related data for the catchment, including: water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH	1.5.1	Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.	The Water Stewardship Plan list Catchment plan publicly led initiatives and public Policy goals with links to those plans and initiatives. Evidence: Followed links to the “Mornington Peninsula Smart water plan” The applicable initiatives are reviewed and updated in the plan at the annual review
	1.5.2	Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.	Water Stewardship Plan contains a full list of applicable water related requirements. It also notes that there are no customary water rights Observation. Whist the lists in 1.5.1 and 1.5.2 are full and comprehensive it is not clear how they are identified and maintained.
	1.5.3	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.	All of this information is publicly available documents managed by the appropriate authorities and links are in the Water Stewardship Plan Evidence; Followed link to Melbourne water, water outlook. This also includes various future scenarios such as El Niño events. This covers predictions 10 year forwards
	1.5.4	Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified	All of this information is publicly available documents managed by the appropriate authorities and links are in the Water Stewardship Plan Evidence: Followed link to the South East water, Water Quality report The Water Stewardship Plan also notes that there are not any anticipated future changes in water quality.

	1.5.5	Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.	Important Water related areas are identified by the (independent) Western Port catchment indicator analysis. The WPM regional catchment management strategy has set targets for the entire area systems and waterways for 20 and 100 years. Monitoring data is updated every 3 years.

	1.5.6	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.	Public reports are referenced in the Water Stewardship Plan outlining urban water strategies and drought preparedness. These do not consider the state of the shared infrastructure itself. However discussions with the management indicated that there were many meetings with SE water related to supply and waste water treatment that will consider capacity and infrastructure. Observation The site needs to elaborate how they consider the condition of shared infrastructure in the catchment at times of routine communications with SE water. The guide says. At a minimum, the site should provide a summary of the extent of water infrastructure, its general age and condition and percentage of catchment population served. It should report on any regular problems, on risks and include an overview of policies for upgrade (for example, to meet growing demand) or risk mitigation (for example from extreme events, such as drought).
	1.5.7	The adequacy of available WASH services within the catchment shall be identified.	WASH in the catchment is not an unmet need. Facilities for WASH are provided across all municipalities.
	1.5.8	**Advanced Indicator** Efforts by the site to support and undertake catchment level water-related data collection shall be identified.	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. 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.

	1.5.9	**Advanced Indicator** The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified.	Since here are no unmet WASH issues this advanced criterion is not available.
1.6 Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.	1.6.1	Shared water challenges shall be identified and prioritized from the information gathered.	The current Water Stewardship Plan lists and prioritises the shared challenges identified with stakeholders.
	1.6.2	Initiatives to address shared water challenges shall be identified.	There are numerous initiatives mentioned later in the Water Stewardship Plan 2.3.3 2.3.4 eg the Western Port Biosphere programmes, Melbourne water stream side funding programme. Observation. These initiatives, including ones that Ingham's are not directly involved in could also be summarised as part of the Share water challenges table in the Water Stewardship Plan 1.6.
	1.6.3	**Advanced Indicator** Future water issues shall be identified, including anticipated impacts and trends	Climate resilience impact assessments have been done for all sites based on preparedness for extreme weather events. 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 was conducted early 2019. Reviewed Power Point Presentation Climate resilience for Ingham's Strategic Risk Assessment. Reviewed Ingham's Strategic Risks which are analysed out to 2070. The LCA Tool is now operational.
	1.6.4	**Advanced Indicator** Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water.	Not yet done Observation: A simple social impact assessment may assist in developing and monitoring social and environmental values and create a score card for monitoring. This would also qualify for advanced point
1.7 Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and	1.7.1	Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.	The Water Stewardship Plan outlines and prioritises water risk and gives general impacts. Detailed costs to back up the impacts are not presented in the Water Stewardship Plan; However the risks originate from various Company risk assessments and business continuity exercises that have more detailed considerations. Evidence

future risk trends identified in 1.6			Inspected Business continuity plan 5 July 2019 Observation: the Water Stewardship Plan could reference the source of the risks e.g. company risk assessments or Business continuity plan and the implications and general costs indicated from those exercises.
	1.7.2	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.	The Water Stewardship Plan outlines and prioritises water opportunities, this gives general savings and positive outcomes. This includes a consideration of cultural sensitivity in relation to traditional methods on indigenous land holders' properties. E.g. consultation with the local Indigenous land council prior to planting and weed control in Watson Creek.

1.8 Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.	1.8.1	Relevant catchment best practice for water governance shall be identified.	The site has the following evidence of best practice (per the guidance) • A comprehensive water stewardship plan that is routinely reviewed and updated • Designating responsibility for water stewardship to senior staff. • Training key employees on the principles of water stewardship. Information to all employees on water stewardship how they can incorporate them within their daily tasks and responsibilities • Engaging with peer organizations and stakeholders to promote water stewardship for example the Western Port Biosphere water stewardship initiative. • Demonstrating your support for good water governance and stewardship with appropriate authorities • Communicating on your own water stewardship to set a leading example to others eg the former group sustainability manager was recognised with the AWS international water stewards of the year awarded in November 2019
	1.8.2	Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.	There are numerous examples at the site. Undertake a detailed study on how water is used in the organization, when and what for (as an extension of the water balance assessment of 1.3.2). This will help to

			prioritize where to focus water efficiency efforts or installation of water efficient technology. • daily and weekly efforts and meetings with workers to improve efficiency. • Install water efficient spin chillers in 2019.
	1.8.3	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.	Examples include. Implementing Advance Water treatment that reduced trade waste by 70%. •There are extensive and in some cases real time water quality monitoring to ensure that they are within limits. Evidence: Inspected N2 and BoD measurements as an example
	1.8.4	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.	Examples include Reducing polluting run-off by utilising AWT •Continues work in eh Watson Creek area to improve the water way. Eg additional plantings in 2019.. • Part of a regular monitoring program to observe any changes to or impacts on the Watson Creek. E.g. in 2019 there was a report on key biotic indicators in the creek. • Continued support for the project.
	1.8.5	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.	WASH is not an unmet need. Both site and catchment meet regulatory standards for supply and quality of water for sanitation and hygiene.

STEP 2: COMMIT AND PLAN

Commit to be a responsible water steward and develop a water stewardship plan

Intent: To ensure there is sufficient leadership support, site authority, and allocated resources for the site to implement the AWS Standard. It focuses on how a site will act on shared water challenges and improve its performance and the status of its catchment in terms of the AWS water stewardship outcomes. Step 2 links the information gathered in Step 1 to the actions implemented in Step 3, by describing who will do what and when.

Criteria		Indicators	Response Area
2.1 Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.	2.1.1	A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments: That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes; That the site implementation will be aligned to and in support of existing catchment sustainability plans; That the site's stakeholders will be engaged in an open and transparent way ; That the site will allocate resources to implement the Standard.	Signed documents demonstrated commitment to water stewardship and covers the requirements in 1.1 Evidence Site Commitment document endorsed by Tim Singleton COO updated and signed by new plant manager Gerard Segrave Oct 2019. Publicly available on the Ingham web site at: This online commitment was Viewed at the audit. The wording now reflects version 2 of the standards.
	2.1.2	**Advanced Indicator** A statement that explicitly covers all requirements set out in Indicator 2.1.1 and is signed by the organization's senior-most executive or governance body and publicly disclosed shall be identified.	CEO Jim Layton has delegated to the COO but has signed the Environmental policy. The water stewardship statement and Environmental Policy have senior management support and commitment.
2.2 Develop and document a process to achieve and maintain legal and regulatory compliance.	2.2.1	The system to maintain compliance obligations for water and wastewater management shall be identified, including: Identification of responsible persons/positions within facility organizational structure;Process for submissions to regulatory agencies.	The EMS (Roles and Responsibilities) sates that the site manager has overall responsibility for legal compliance. Greg Menz has left but the incoming HSE Manager then has overall responsibility for implementation of Water Stewardship standard requirements on site The relevant legal requirements and how they are met are identified in the Water Stewardship Plan
2.3 Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.	2.3.1	A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.	The water stewardship plan includes overarching goals around water stewardship e.g. in the introduction. The guidance tells "us that The strategy tends to be the vision and mission around stewardship, with some high-level overarching goals".

			Observation: The Strategy is not clear as envisaged by the guidance and could be better placed adjacent to the tabulated Water Stewardship Plan.
	2.3.2	A water stewardship plan shall be identified, including for each target: How it will be measured and monitored; Actions to achieve and maintain (or exceed) it; Planned timeframes to achieve it; Financial budgets allocated for actions; Positions of persons responsible for actions and achieving targets; Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.	3.2.2 A tabulated plan exists as per the guidance. This addresses site risks, opportunities and stakeholder shared water challenges. At the time of the 2019 audit the auditor reviewed the Water Stewardship Plan last updates August 2019
	2.3.3	**Advanced Indicator** The site's partnership/water stewardship activities with other sites within the same catchment (which may or may not be under the same organisational ownership) shall be identified and described.	**The site works as part of a water stewardship initiative under the auspices of the Western Port Biosphere.** **Where chicken growers are in the same catchment the site works with them to reduce embedded water.**
	2.3.4	**Advanced Indicator** The site's partnership/water stewardship activities with other sites in another catchment(s) (either under same corporate structure or with another corporate site) shall be identified.	**4 out of 5 Inghams plants are AWS certified. The last plant is due for certification in 2020. This site, being the first acted as the exemplar for the development of WS at other sites. The HSE manager was recently involved in mentoring the SA site which has just completed its initial audit.**
	2.3.5	**Advanced Indicator** Stakeholder consensus shall be sought on the site's water stewardship plan. Consensus should be achieved on at least one target. A list of targets that have consensus and in which stakeholders are involved shall be identified.	**Evidence WC Catchment creek Landcare management minutes 13 June 2019.** **Notes that actions related to IWRA targets are being achieved and continue to involve the stakeholders eg additional tree planting.**
2.4 Demonstrate the site's responsiveness and resilience to respond to water risks	2.4.1	A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.	The Site AWTP has a HACCP manual for operation that includes Emergency Response Protocols in Section 17. There are several examples of responsiveness and resilience: • If recycled water does not meet specification reversion to 100% town water is required. • 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. • Environmental incidents are reported and reviewed daily at the DOR meetings (Daily Operational Report) no discharges is the audit period • There is a triple interceptor to catch run off and there are daily inspections. • Climate resilience impact assessments have been done for all sites based on preparedness for extreme weather events.
	2.4.2	**Advanced Indicator** A plan to mitigate or adapt to water risks associated with climate change projections developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.	February 2019 undertaken a climate resilience assessment in House. Key senior executives attended. This used Public information and trends to develop the assessment. Identified 5 key areas and 15 recommendations Evidence: Inspected the presentation material used on the day

STEP 3: IMPLEMENT
Implement the site's stewardship plan and improve impacts

Intent: To ensure that the site is implementing the plan outlined in Step 2, mitigating risks and driving actual improvements in performance.

Criteria		Indicators	Response Area
3.1 Implement plan to participate positively in catchment governance.	3.1.1	Evidence that the site has supported good catchment governance shall be identified.	Reviewed Engagement register. Examples of engagement included. October 2019 Contact with Matt Mollett S E Water e mail and in person on the recent performance of the plan plus SE water plans and opportunities for cooperation eg Tyabb Somerville recycled water project.
	3.1.2	Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.	There are no rights identified however there have been engagement with the Indigenous land council in October and November re advise on protected areas prior to any work to do with re planting work.
	3.1.3	**Advanced Indicator** Evidence of improvements in water governance capacity from a site-selected baseline date shall be identified.	Not assessed
	3.1.4	**Advanced Indicator** Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the good water governance of the catchment shall be identified.	Evidence of stakeholder approval from meeting minutes of ongoing engagement with the Western Port Biosphere Foundation was inspected. Western Port Biosphere presented Ingham's with a Water Stewardship award on 16th November 2017 Work with this and other governance bodies is ongoing.
3.2 Implement system to comply with water-related legal and regulatory requirements and respect water rights.	3.2.1	A process to verify full legal and regulatory compliance shall be implemented.	4.1.1 Detailed in EMP ss 3 is the legal section detailing legal requirements and compliance dated August 2019. There is a summary of all compliance and performance Trade waste agreement non-compliance for non-complying pH is noted 17 July 2019 Review of compliance at sustainability team meetings where compliance is an agenda item and any violations or incidents are recorded. Evidence: latest meeting minutes 26 August 2019 includes any environmental The pH non was highlighted:

	3.2.2	Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.	There were are water rights areas identified including indigenous rights.
3.3 Implement plan to achieve site water balance targets.	3.3.1	Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.	There are 3 Key water balance targets. Evidence reviewed data from weekly HSE KPI stats from this its show. • L/bird target has improved YTD. 21.27 (target 21.8). • Waste water recycling at 71.2% YTD on a target of 70%. • Reinstate rainwater recovery. Rainwater recovery reinstated. There was some key progress this year including installation of new spin chillers.
	3.3.2	Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.	Water and waste are now called "Planet KPIs" Annual targets and performance are as per 3.3.1. These are tracked and reported to the CEO level at a Sustainability Council Evidence inspected the presentation for this meeting.
	3.3.3	Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.	No such requirements exist.
	3.3.4	**Advanced Indicator** The total volume of water voluntarily re-allocated (from site water savings) for social, cultural and environmental needs shall be quantified.	By using AWTP water allocations revert to other water users at the SE water level. The volume reallocated can be quantified but where its has gone is the prerogative of SE water. The criteria is not met Recommendation. It could be possible to quantify the amounts and disposition of water savings reallocated though SE water.
3.4 Implement plan to achieve site water quality targets.	3.4.1	Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.	Key targets are meeting trade waste agreement levels and the water quality on Watson Creek.
	3.4.2	Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's	Advance Water Treatment installed in 2010 represents the pinnacle of best practice.

		effluent shall be identified and where applicable, quantified.	Trade waste limits are set by SE water but the plant is well below that target. The NZ plant is the only plant bench marked against comparable local processors to demonstrate best practice. Best practice is indicated by comparisons Sommerville to NZ. NZ Total suspended Solids 6g/cuM Bod 2.4 c/cuM Total Phosphorous 2.04 g/cuM Total Nitrogen 10.2 g/cuM E Coli >1 CFU/100m Somerville NZ suspended Solids 9g/cuM Bod Not measured Total Phosphorous 1.45 g/cuM Total Nitrogen 5.36 g/cuM E Coli >1 CFU/100m
3.5 Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.	3.5.1	Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.	The Key objective is the management of Watson Creek. This project on going since the AWS pilot was developed in 2008. This year the project continues with Tree planting Evidence Watson creek land care group meeting 14 June 2019
	3.5.2	**Advanced Indicator** Evidence of completed restoration of non-functioning or severely degraded Important Water-Related Areas including where appropriate cultural values from a site-selected baseline date shall be identified. Restored areas may be outside of the site, but within the catchment.	The Watson Creek was reported as one of the most degraded and polluted waterways in Victoria. Rehabilitation is essentially completed but Ingham's continue to be involved in additional enhancement projects.
	3.5.3	**Advanced Indicator** Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the healthy status of Important Water-Related Areas in the catchment shall be identified.	Inspected the latest Minutes of the Western Port Biosphere meetings where Ingham's attend with a range of other stakeholders. These minutes continue to recognise the contribution of the site to contributing to the restoration and continued enhancement of the Watson Creek.
3.6 Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all	3.6.1	Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.	WASH is not an unmet need so not a key challenge in the plan. Safe drinking water and effective sanitation is maintained per regulatory requirements. The advanced points are therefore not attainable.

premises under the site's control.			
	3.6.2	Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for Indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.	There are no issues with safe water and sanitation of traditional access for local and indigenous communities. Notwithstanding there is evidence of voluntary engagement with the local Burongong Indigenous land council.
	3.6.3	**Advanced Indicator** A list of actions taken to support the provision to stakeholders in the catchment of access to safe drinking water, adequate sanitation and hygiene awareness shall be identified.	WASH is not an unmet need so not a key challenge in the plan. Safe drinking water and effective sanitation is maintained per regulatory requirements. The advanced point are therefore not attainable.
	3.6.4	**Advanced Indicator** In catchments where WASH has been identified as a shared water challenge, evidence of efforts taken with relevant public-sector agencies to share information and to advocate for change to address access to safe drinking water and sanitation shall be identified.	WASH is not an unmet need so not a key challenge in the plan. Safe drinking water and effective sanitation is maintained per regulatory requirements. The advanced point are therefore not attainable.
3.7 Implement plan to maintain or improve indirect water use within the catchment.	3.7.1	Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.	Although indirect water use is not a key objective in the plan the new LCA tool is identifying and quantifying indirect use with the long-term goal of reducing it.
	3.7.2	Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.	There is evidence of engagement with growers, feed suppliers, Hatcheries, internal farms where these are within the sites sphere of influence.
	3.7.3	**Advanced Indicator** Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.	The new LCA tool works without geographic limitations. Out of catchment indirect water use is also monitored and is art of the overall goal of reducing indirect water use.
3.8 Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.	3.8.1	Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.	Although The shared challenges for shared water related infrastructure have not been clearly identified per the guidance there is clear evidence of engagement at time like meetings on trade water contracts and water allocations.

3.9 Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.	3.9.1	Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.	Evidence: Inspected Environmental engagement stakeholder register. There is continued evidence of moving towards best practice governance though engagement with South East water (involvement with Tyabb Somerville recycled water project) Western Port Biosphere Port Philip and Western port management catchment management authority (around RAMSAR sites). Observation: The Environmental engagement stakeholder register is an excellent tool that should be maintained and rolled out to other sites.
	3.9.2	Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.	Inspected records of Sustainability team meetings which shows continued actions to achieve better or best practice water balance.
	3.9.3	Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.	There are 2 key water quality targets. For the condition of Watson Creek was independently assessed and found to be improving using a biotic indicator species the Dwarf Glaxia. Water quality figures show that trade waste is continually well within limits. The installation of new spin chillers will help improve water quality.
	3.9.4	Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.	Inspected a catchment condition report and independent report on Watson Creek indicate IWRA targets continue to be met or exceeded. Continued efforts eg tree planting will preserve and enhance the condition of the creek. Evidence: inspected Western Port Biosphere web page report on Watson Creek
	3.9.5	Actions towards achieving best practice related to targets in terms of WASH shall be implemented.	Wash is not an unmet need. The site and local authorities continue to meet regulatory expectations for the provision of safe drinking water and sanitation to all.
	3.9.6	**Advanced Indicator** Achievement of identified best practice related to targets in terms of good water governance shall be quantified.	There are examples of efforts to engage that have benefited water governance, but there is no list of these efforts 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 16th November 2017

		Current Minutes indicate continued involvement**.**
3.9.7	**Advanced Indicator** Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified.	All of the relevant best practice indicators in the Guidance 1.8.2 have been met or exceeded. A significant water balance benefit comes from the reuse of 70% through Advanced water treatment.
3.9.8	**Advanced Indicator** Achievement of identified best practices related to targets in terms of water quality shall be quantified.	All of the relevant best practice indicators in the Guidance 1.8.3 have been met or exceeded. A significant water quality benefit comes from the use of Advanced water treatment. Evidence of best practice was demonstrated in wastewater by comparison to other sites.
3.9.9	**Advanced Indicator** Achievement of identified best practices related to targets in terms of the site's maintenance of Important Water-Related Areas have been implemented.	All of the relevant best practice indicators in the Guidance 1.8.4 have been met or exceeded. The Watson Creek project is acknowledged as an outstanding example of restoration of a severely degraded IWRA.
3.9.10	**Advanced Indicator** Achievement of identified best practice related to targets in terms of WASH shall be quantified.	WASH is not an unmet need to these advanced points are not available.
3.9.11	**Advanced Indicator** A list of efforts to spread best practices shall be identified.	**WPB Watson Creek project Completed with enhancements ongoing.** **There is continued work with the catchment group.** **There is a new partnership with conservation Volunteers Australia with one event completed and a second planned.** **Engaged Peninsular bush works for replanting.** **Engaged with VicRoads on a study to identify fauna in the Watson creek area (Identification of potential conservation values) and disseminated information to an agreed stakeholder group.** **You tube video presenting the project.** **• E mail to group members and stakeholders approving the grant for the project (MPLN e mail re WSRL grant 17 Nov 2014)** **Ongoing Ingham's monitoring on Watson creek shows improvements in the areas adjacent to the plant.**

			This site has also been involved in mentoring other sites to Water stewardship. **The 2018 weed clearing project mapped out the works done and the improvements in terms of weeds cleared.** **An award in 2017 from the Western Port Biosphere group, which is stakeholder driven, also indicated stakeholder acknowledgement of best practice http://mpnews.com.au/2017/11/28/water-awards-for-meat-and-vege-producers/**
	3.9.12	**Advanced Indicator** A list of collective action efforts, including the organizations involved, positions of responsible persons of other entities involved, and a description of the role played by the site shall be identified.	Weeding & tree planting along the Watson Creek tributary on the Ingham's property – conducted in April 2019 and June 2019. Parties involved were: Conservation Volunteers Australia helped with organising the event, Peninsular Bushworks provided planting work, actual volunteer work carried out by Ingham's employees at the Somerville site as well as Watson Creek Catchment Landcare Group. Evidence inspected email titled "Tree planting", dated 12 July 2019, composed by Greg Menz.
	3.9.13	**Advanced Indicator** Evidence of the quantified improvement that has resulted from the collective action relative to a site-selected baseline date shall be identified and evidence from an appropriate range of stakeholders linked to the collective action (including both those implementing the action and those affected by the action) that the site is materially and positively contributing to the achievement of the collective action shall be identified.	**Conservation Volunteers' progress report dated Sep 2019 – this is a report for all of the Ingham's volunteer activities taken place to date in the calendar year 2019, of which Somerville site's progress is part of (under location "Melbourne"). This quantifies the work done and also the representative financial value provided by the Ingham's contribution. (Evidence material – Inghams project day states**

STEP 4: EVALUATE
Evaluate the site's performance

Intent: To review a site's performance against the actions taken in Step 3, learn from the results – both intended and unintended – and inform the next iteration of the site's water stewardship plan. This evaluation shall occur at least annually, but sites should consider more frequent evaluations.

Criteria		Indicators	Response Area
4.1 Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.	4.1.1	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.	These have bee evaluated "Evidence Summary of Water Stewardship plan Progress FY 2019" made available on the Ingham's website. Also a detailed table "water stewardship plan review" Inspected
	4.1.2	Value creation resulting from the water stewardship plan shall be evaluated.	The table "water stewardship plan review" shows targets metric and outcomes/ achievements. This is expressed in numeric values where possible
	4.1.3	The shared value benefits in the catchment shall be identified and where applicable, quantified.	The table "water stewardship plan review" shows targets metric and outcomes/ achievements. This is expressed in numeric values where possible. Eg Minimise trade waste and water consumption. This links to the shared challenge that there is limited waste water treatment capacity.
	4.1.4	**Advanced Indicator** A governance or executive-level review, including discussion of shared water challenges, water risks, and opportunities, and any water-related cost savings or benefits realized, and any relevant incidents shall be identified.	**Not assessed**
4.2 Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.	4.2.1	A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.	The annual plan is reviewed and updated August 2019. There have been no incident and this links to a shared challenge of no point source contamination to Watson Creek
4.3 Evaluate stakeholders' consultation feedback regarding the site's water stewardship	4.3.1	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.	The plan and the progress update have been published and sent to all stakeholder. There has not been a specific response to this wide circulation.

performance, including the effectiveness of the site's engagement process.			There are also examples of specific consultations on the plan with targeted stakeholders eg Matt Mollett of SE water.
	4.3.2	**Advanced Indicator** The site's efforts to address shared water challenges shall be evaluated by stakeholders. This shall include stakeholder reviewing of the site's efforts across all five outcome areas, and their suggestions for continual improvement.	**Not assessed**

4.4 Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.	4.4.1	The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.	The Water Stewardship plan has been reviewed ad updated as at August 2019. Modifications include. Modifications to meet version 2 of the standard. Tightening of water balance target Lt/Bird. As a result of not meeting rainwater harvest targets (only 32% due to malfunction) in the last plan the new plan has a target of totally reinstating rain water harvest infrastructure.

STEP 5: COMMUNICATE & DISCLOSE
Communicate about water stewardship and disclose the site's stewardship efforts

Intent: To encourage transparency and accountability through communication of performance relative to commitments, policies, and plans. The disclosure of relevant information allows others to make informed opinions on a site's operations
and tailor their involvement to suit.

Criteria		Indicators	Response Area
5.1 Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.	5.1.1	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.	Inspected Organisational chart. "water related internal Governance" on the Ingham's website.
5.2 Communicate the water stewardship plan with relevant stakeholders.	5.2.1	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.	A summary is on the web site and the link to this has been e mailed to the full Stakeholder list. Evidence group e mail dated 13 November 2019.
5.3 Disclose annual site water stewardship summary, including the relevant information about the site's annual water stewardship performance and results against the site's targets.	5.3.1	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.	A summary is on the web site Summary of water stewardship plan progress.
	5.3.2	**Advanced Indicator** The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report.	**The 2019 Annual report efforts to implement the AWS Standard are**
	5.3.3	**Advanced Indicator** Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report.	**Not assessed**
5.4 Disclose efforts to collectively address shared	5.4.1	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.	Inspected "Efforts to address shared water challenges Ingham's Somerville". This is on the Ingham's web site

water challenges, including: efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.	5.4.2	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.	"Efforts to address shared water challenges Ingham's Somerville" Includes summary of engagements with stakeholders and public agencies
5.5 Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.	5.5.1	Any site water-related compliance violations and associated corrections shall be disclosed.	Only one violation was noted. The company advises that this is available on request Recommendation. It should be explicit somewhere in public that these are available on request.
	5.5.2	Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.	Only one violation was noted. The company advises that the corrective action will be disclosed and is available on request Recommendation. It should be explicit somewhere in public that these are available on request.
	5.5.3	Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.	There have been no such incidents.

END OF REPORT