

ALLIANCE FOR WATER STEWARDSHIP

Audit Report

CONFIDENTIAL

Client name	Inghams Enterprises Pty Ltd
Audit date/s	15 th and 16 th November 2021
Audit location	27-35 Sturton Road, Edinburgh Parks SA 5111 Australia Audit done remotely.
Audit report completed by	Graeme Lea – Lead Auditor
Proposed date of next audit:	November 2022

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 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 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 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

Address of certified operation	27-35 Sturton Road, Edinburgh Parks SA 5111 Australia		
Management representative	Kimberly McLaughlan	Job title	HSE Coordinator
Email address	kmclaughlin@ingham.com.au	Phone number	08 8259 0700 M: 0427 306 969
AWS Registration #	Pending		
Certificate Number	Pending	Date of first certification	Pending
Current Certificate start date:		Current Certificate expiry date	

2. Details of Audit & Scope of Certification

Audit type:	Certification audit
Audit team and roles:	Graeme Lea – Lead Auditor Julian Whiting Catchment Expert
Standard:	The AWS International Water Stewardship Standard Version V 2.0
Scope of certification:	Water Stewardship in the secondary processing of poultry
Operations covered by scope of certification:	Secondary processing of poultry received from primary (company) facilities
Other certification scheme/s this company is certified for:	BRC

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.

☐ Yes

☒ No

3. Executive Summary

Main items / Critical Control Points / Places inspected (including names & affiliations of people consulted)	Number of NCRs
Interviews held onsite with Kimberley McLaughlin – HSE Co-ordinator, Felix Groening – Engineering Manager, Jason Rogers – Services Technician -DAF Plant and Mark Shandley – production Manager	
Ingham's Edinburgh offices -Edinburgh – opening meeting Inspected site monitoring points, bore, storm water drainage system, DAF and water storage facilities, observed use of ENVIZI and AZZO, inspected discharge area into Helps Road Drain. Viewed processing area in operation from viewing area.	
Contacted key stakeholders by phone and email	
Step 1 Gather and Understand NCR # 1 Clause 1.2.1 Minor NCR # 2 Clause 1.3.7 Minor NCR # 3 Clause 1.5.2 Minor	3
Step 2 Commit and Plan	0
Step 3 Implement NCR # 4 Clause 3.9.2 Minor	1
Step 4 Evaluate NCR # 5 Clause 4.1.2 Minor NCR # 6 Clause 4.1.3 Minor NCR # 7 Clause 4.2.1 Minor NCR # 8 Clause 4.3.1 Minor	4
Step 5 Communicate & Disclose NCR # 9 Clause 5.1.1 Minor NCR # 10 Clause 5.3.1 Minor	2

Were there any NCR(s) issued at the previous audit?

☐ Yes

☒ No

Allocation of points and Lead Auditor Recommendations

Total number of points awarded to site
*collated number from end of report

69

Recommended level of certification

Gold

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 below.

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

Company History

The site was constructed in 2006/2007 and began operation in September 2007. The site lies within land which was formerly enclosed within the Edinburgh Parks RAAF base. The RAAF base still borders the site at its Northern face with Sturton Road marking the boundary. The Southern face of the site borders Edinburgh Road and beyond this there is some very limited industrial development (1km).

Processes

Chilled chicken is received from primary processors (Inghams Boliver and Inghams Marairee. The meat is processed into a range of cooked and processed items (Skus), frozen, packed and delivered to distribution centres.

Facilities

The Edinburgh Parks site is located on a 13.15-hectare site at 27-35 Sturton Road, Edinburgh Parks, SA, about 33 kilometres north of Adelaide. The building footprint occupies approximately 23,991m². The plant and associated buildings occupy around 17% of the site. The remainder is comprised by yard, carpark areas and future development opportunities. The surrounding land use is predominantly commercial businesses. The nearest residence is approx. 8km away. The site is adjacent to a number of wetlands and creek systems. The storm water discharge from the site is from the Southern boundary.

The site was constructed in 2006/2007 and began operation in September 2007. The site lies within land which was formerly enclosed within the Edinburgh Parks RAAF base. The RAAF base still borders the site at its Northern face with Sturton Road marking the boundary. The Southern face of the site borders Edinburgh Road and beyond this there is some very limited industrial development (1km). A large Coles Distribution Centre (500m) and Ausco, a small portable building constructor (20M) are located on the Western face and the Eastern face is predominantly undeveloped land with a truck maintenance facility (100m) located at the South-East boundary of the site. Across the main road to the East of the site is the DSTO site.

The site's water supply is drawn from the municipal system which makes up North Metro Supply area. Wastewater from the plant is treated in the DAF (Dissolved Air Filtration System) and after processing it is discharged through the trade waste system.

A large proportion of the municipal supplied water is sourced from a range of different places to supply not only the North Metro Region (Inghams Plant Location) but also all of South Australia. The majority of municipal water comes from the River Murray, but surface water, sea water and groundwater also make it into the municipal water supplies.

The Inghams site is supplied by the North Metro supply system which includes drinking water from Anstey Hill, Happy Valley, Barossa, Little Para and Adelaide Desalination Plant.

Number of Employees


Approximately 300 depending on the processing being carried out. This is a mix of Inghams staff and labour Hire

Other Information

n/a

Catchment Narrative
(from discussions with catchment expert)

Due to the complexity of this document the attachment is shown here:



Inghams_Edinburg
hParks_catchment n

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	Points Allocated
<p>1.1 Gather information to define the site's physical scope for water stewardship purposes, including:</p> <ul style="list-style-type: none"> its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; <p>the catchment(s) that the site affect(s) and upon which it is reliant.</p>	1.1.1	<p>The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:</p> <p>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.</p>	<p>The Water stewardship plan clearly outlines Site boundaries.</p> <ul style="list-style-type: none"> 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 wastewater service provider (if applicable) and ultimate receiving water body or bodies; Catchment(s) that the site affect(s) and is reliant upon for water The site's water supply is drawn from the municipal system which makes up North Metro Supply area. Wastewater from the plant is treated in the DAF (Dissolved Air Filtration System) and after processing it is discharged through the trade waste system. A large proportion of the municipal supplied water is sourced from a range of different places to supply not only the North Metro Region (Inghams Plant Location) but also all of South Australia. The majority of municipal water comes from the River Murray, but surface water, sea water and groundwater also make it into the municipal water supplies. The Inghams site is supplied by the North Metro supply system which includes drinking water from Anstey Hill, Happy Valley, Barossa, Little Para and Adelaide Desalination Plant. 	
<p>1.2 Understand relevant stakeholders, their water related challenges, and the site's ability to influence beyond its boundaries.</p>	1.2.1	<p>Stakeholders and their water-related challenges shall be identified. The process used for</p>	<p>The Water Stewardship plan 1.2 outlines the stakeholders and the sites' ability to influence them. This includes Neighbours, Local Traditional Owners (indigenous), City</p>	

		<p>stakeholder identification shall be identified.</p> <p>This process shall:</p> <p>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.</p>	<p>Council, SA Water, Department for Environment and Water, WSA, SA EPA, Customers, suppliers.</p> <p>1.2.2.1 gives a base line on engagement efforts to date. Reviewed email correspondence to SA Water dated 29/3/21 (Covid has impacted visitors to the site)</p> <p>An SA Water technical Officer visited the site on 5/5/21 when SA Water visited and offered technical assistance. Data is received from SA Water periodically to track usage (quarterly) shows trends, including water increases when a second production line to the facility</p> <p>Non conformance</p> <p>As stated, there is only one attempt to reach out to an NGO group (11/8/21) to Water Sensitive SA, This is not considered sufficient and should continue. Also, the Internal Supplier list in the Stakeholders List requires revising to include all suppliers of chicken meat to the site.</p> <p>NOTE:. NGOs are active both regionally and nationally. Australian Conservation foundation. KESAB, water sensitive SA. Friends of the Earth, WWF. Also, the Internal Supplier list in the Stakeholders List requires revising to include all suppliers of chicken meat to the site</p>	
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	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 Water Stewardship plan 1.2 outlines the stakeholders and the sites' ability to influence them and also sets out water sources and receiving bodies in the sites sphere of influence.	
1.3 Gather water-related data for the site including: <ul style="list-style-type: none"> • water balance • water quality • important water related areas • water governance • WASH (water related costs, revenues and shared value creation) 	1.3.1	Existing water-related incident response plans shall be identified.	<p>Review of the Inghams WSP confirmed that SA Water ensures that the water quality is strictly maintained throughout their metropolitan, country and remote distribution network.</p> <p>SA Water publishes water quality data on its' website where samples which have been collected are analysed for a number of key requirements https://www.sawater.com.au/about-us/annual-reports/water-quality</p> <p>Water quality testing happens throughout the year and reported on the SA Water website on an annual basis. The Inghams Edinburgh Parks site is located within the northern water locality area.</p> <p>The below table indicates the characteristics of the water treatment for this locality.</p> <p>The WSP includes data relating to water balance water quality, IMRA water governance and WASH</p> <p>Document 3.11 National Preparedness and response Procedure covers all Ingham's sites in Australia and includes water related emergencies plans</p> <p>SWP 37 Site Spill Kit the site has an emergency response procedure that includes response to a range of scenarios including spills.</p>	
	1.3.2	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped.	<p>The site water meters are read daily and the usage is recorded on a spreadsheet on the local drive. This details all water inputs and outputs from the site. The information is then uploaded to Teams (operational scorecard) and tracked weekly. Usage, trends and tonnage per usage is reviewed.</p> <p>The Edinburgh Parks site is authorised under the Water Industry Act 2012 to discharge trade waste in accordance with Authorisation # 522776 with SA Water</p>	

			There is a schematic map on Pg 6 of the Water Stewardship plan	
	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.	<p>The information stated above is then uploaded to Teams (operational scorecard) and tracked weekly. Usage, trends and tonnage per usage is reviewed.</p> <p>Water usage is monitored monthly and reported monthly to the national team (Senior leadership Team – further processing on and quarterly. Reviewed KPIs for FY 21 target was 11KL/t and use was 9.19KL/t, In FY 22 the target has been reduced to 10.2 KL/t and currently usage is at 6.92 KL/t</p>	
	1.3.4	Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be 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.	<p>The Quality department complete Micro Testing as per the water testing schedule. These swabs and results are conducted and reviewed by the quality team. Water testing is done in relation to food safety requirements (customer requirements). Reviewed the Food Safety and Quality Management System, EP Water Swabbing Schedule 2021 which showed overall compliance for the financial year. Requests are received from customers to the Quality Manager.</p> <p>The samples are sent to the lab for testing, any positive test trigger retesting, the site requires negative results at all times</p> <p>Inwards water is tested by SA water. The auditor confirmed in interview that there is no directly sourced bore water, with all water used on site sourced from SA Water. Trade waste is sampled at the DAF Plant for SA water analysis.</p>	
	1.3.5	Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.	<p>The HSE Coordinator maintains a register of Hazardous Substances and Dangerous Goods, which includes copies of Safety Data Sheets (SDS)</p> <p>Reviewed Hazardous Chemicals Register Reviewed Spill Risk Assessment RA131120 has been completed for the site, which identifies potential sources of pollution and the control measures in place to reduce the risk. The Environmental Management Plan also</p>	

			<p>contains a register of potential sources of spills. The company has spill kits on site for small spills</p> <p>Chemical storage sheds and the DAF plant are all adequately bundled.</p> <p>Reviewed RA0300321 Emergency and Preparedness Response which includes flooding as a risk</p> <p>All risk assessment are reviewed at least every five years</p> <p>Evidence: Inspected Risk management worksheet for chemicals.</p>	
	1.3.6	On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.	<p>The SWP outlines the Important Water Related areas Cultural values are included.</p> <p>The SWP shows the areas on the site map. These are largely in line with the Inghams Bolivar site as the two plants are geographically with 15 km of each other and in the same water catchment.</p> <p>There are no actual onsite IWRA as this facility is in a semi developed industrial area, there are vacant lots either side on the facility, but these are not classified as IWRA</p>	
	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.	<p>Reviewed section 1.4.6 of the WSP shows costs only but no revenue, during the site visit it was identified that Ingham's derive income from solids waste recovery as a result of the wastewater cleaning process.</p> <p>Waste oil from processing and removed from the wastewater is collected into IBC's and taken for recycling.</p> <p>Also confirmed in interview there is no environmental or economic value generated by the site. Wastewater is the only water output from the site which is discharged into the SA Water Trade waste system and is a cost to the site.</p> <p>Nonconformance</p>	

			There is no consideration of social or cultural water related value generation in the WSP.	
	1.3.8	Levels of access and adequacy of WASH at the site shall be identified.	Inghams have included a simple statement with qualification that there are no unmet WASH needs. <i>Note: Adelaide, South Australia has adequate water quality and sanitation and therefore there are no unmet WASH requirements</i>	
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.	<p>Embedded water use is considered as a whole of company issue that a processing site can't easily influence; however, the Edinburgh site has identified upstream water use as</p> <p>The water usage of the upstream process FY21 is as below:</p> <p>Bolivar 1,054,705kL</p> <p>Murraylands Hatchery 31,002kL</p> <p>Breeder Farming 164,888kL (Hamley Bridge 38%, Monarto 28%, Yumali 34%)</p> <p>Feedmilling 22,680kL</p> <p>Out of the above sites, the Bolivar sites within the same Catchment as Edinburgh Parks.</p>	
	1.4.2	The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.	Outsourced services were identified as being the off-site laundry services, the WSP states: The laundry is located at Dudley Park (not within the same catchment area) and services the site daily for all uniforms. Currently, all of SA use approximately 1743kg per week. This is based on an average of 8 litres per kilogram and 13,994 litres per week.	
	1.4.3	Advanced Indicator The embedded water use of primary inputs in catchment(s) of origin shall be quantified.	Ingham's Edinburgh have identified that there is very little embedded water use at the site, however water usage from processing raw material inputs from other Ingham's primary processing facilities (Bolivar and Murarrie) have been considered in the WSP. See 1.4.1	7

			NOTE: The Bolivar site is located in the same water catchment as the Edinburgh site.	
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.	<p>The WSP 1.3.1 outlines Catchment plans, publicly led initiatives, public policy goals.</p> <p>Site based governance initiatives are identified as Water saving opportunities and initiatives have been identified by the sustainability team and attend further processing site meetings and are stated below.</p> <ul style="list-style-type: none"> • The site recently reduced 5.7 million litres of water per year by thinking outside the box and reviewing the process with our two ovens on site. Water was used to cool the ovens door seals. Our sustainability team was able to trial and then implement operating these ovens without any water for the door seals and this water saving initiative was successful (February 2021). • The site has a program whereby all water meters are read and recorded on a daily basis. • The site displays its commitment to the Water Stewardship Plan by the display of the signed letter on the main noticeboard on site. • The sustainability team review the water usage per month with all further processing sites. • The management team review the water usage and trends quarterly. The information is readily available via Power BI. • The site has set a reduction in water consumption as per the Environmental Management Plan. • The site releases a monthly dashboard which highlights water usage. • The Edinburgh Parks team has participated in a tree planting initiative on 11/06/21 with Salisbury Council and will continue this initiative in-line with council schedules (Burton West – Industrial Drain). • Lustra (external cleaning contractors) team actively work with Inghams with CI projects and water saving initiatives. Monthly 	

			<p>meetings with leadership and Lustra team to discuss water saving initiatives.</p> <ul style="list-style-type: none"> ○ Oven final rinse/water saving trial. Potential water savings 1,248,00L per year. ○ Line 2/Fryer – 2 day per week cleaning proposal. Potential water savings 1,560,000L per year. • Allergen matrix is used by production and planning departments each week to ensure we optimise our production/cleaning processes each run/week. • Update plant/technology to Revo drums (Capex). By implementing advanced technology by changing from Formax to Revo and also replacing revo drums, water usage to be reduced pending on the product mix. Site currently in the process of calculating and analysing the water savings. • Assist where possible with SA Water and the RAAF base with the PFAS issue. Adams Creek Catchment has very low-level contamination with a range of PFAS chemicals (primarily from legacy fire-fighting foams) emanating from the RAFF Base Edinburgh. The Salisbury Council are currently supporting the Defence and their efforts to remediate contaminated soils, surface and groundwater in the catchment. As a consequence, the Adams Creek Catchment does not harvest/recycle water. 	
	1.5.2	Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.	<p>The auditor found that at the time of the evaluation there was no/very little consideration of legal or customary regulatory rights, or stakeholder verified customary water rights</p> <p>Nonconformance Reviewed section 1.3.2 of the WSP outlines all water related legal and regulatory requirements. However, at the time of the evaluation did not include any reference or consideration of customary water rights</p>	

	1.5.3	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.	<p>Reviewed section 1.3.3 (Catchment Water Balance) the auditor confirmed that the WSP section 1.3.3 of the describes the catchment balance and references SA water documents that quantifies this.</p> <p>As the site only sources mains delivered water from SA Water variances are a responsibility of SA Water, and not a consideration for the site.</p>	
	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	<p>Reviewed 1.3.4 of the WATER STEWARDSHIP PLAN Catchment Water Quality.</p> <p>SA Water publishes water quality data on its' website where samples which have been collected are analysed for a number of key requirements https://www.sawater.com.au/about-us/annual-reports/water-quality</p> <p>Section 1.4.3 Site Water Quality states: There is no onsite testing of municipal water being supplied from SA Water as this is deemed to be acceptable. However due to our customer's requirements and guidelines, our Quality department complete Micro Testing as per the water testing schedule. These swabs and results are conducted and reviewed by the quality team.</p>	
	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.	<p>Important Water Related Areas have been identified as Adams Creek Catchment and Barkers inlet are identified within the area and have also been identified as Wetlands of National Importance</p> <p>An identified threat has been that of PFAD contamination is identified as a key challenge, however SA Water have advised that Adams Creek has very low level contamination only and Salisbury Council are working with the Defence Department to remediate contaminated soils and groundwater.</p> <p>Stormwater impacts on wetlands and final discharge points are quantified. The WSP states: Stormwater enters the Barker Inlet via a number of points which then sits in the wetlands for a minimum of ten days before being discharged through a seawall into the mangroves</p>	

			estuary of the North Arm Creek which makes up part of the Barker Inlet. Cultural Heritage (Kurna people) sites are also considered in this section.	
	1.5.6	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.	<p>The auditor also confirmed in interview that section 1.3.6 of the AWS outlines Water Related Infrastructure. SA Water have a range of reports and models that relate to water infrastructure, and this are referenced.</p> <p>Ingham's state that extreme event planning is carried out by SA Water and that a mains water breakage is considered an extreme event</p> <p>Reviewed Business Continuity Plan Document 30803 revised 20/10/21 – Edinburgh Park planning includes a loss of</p>	
	1.5.7	The adequacy of available WASH services within the catchment shall be identified.	<p>Inghams have included a simple statement with qualification that there is no unmet WASH needs.</p> <p><i>Note: Adelaide, South Australia has adequate water quality and sanitation and therefore there are no unmet WASH requirements</i></p>	
	1.5.8	<p>Advanced Indicator</p> <p>Efforts by the site to support and undertake catchment level water-related data collection shall be identified.</p>	<p>The site water meters are read daily, and the usage is recorded on a spreadsheet on the local drive. This details all water inputs and outputs from the site. The information is then uploaded to Power BI (operational scorecard) and tracked weekly. Usage, trends and tonnage per usage is reviewed, however catchment related data collection is carried out by SA Water</p>	5
	1.5.9	<p>Advanced Indicator</p> <p>The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified.</p>	<p>Ingham's have included a simple statement with qualification that there is no unmet WASH needs.</p> <p><i>Note: Adelaide, South Australia has adequate water quality and sanitation and therefore there are no unmet WASH requirements</i></p>	N/A
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.	<p>The WSP section 1.6 identifies and prioritises shared water challenges.</p> <p>Some of the important Catchment Challenges include,</p>	

			<ul style="list-style-type: none"> • Soil Salinity • Ground Water Use • Shallow water tables and waterlogging • Poor water quality discharges to the marine environment of the Gulf of St Vincent • Localised flooding • PFAS contamination at the Defence facilities surrounding Edinburgh Parks • A changing climate <p>SA Water key environmental objectives include: Effectively manage sewage (wastewater) overflows.</p> <ul style="list-style-type: none"> • Minimise discharges from wastewater treatment plants. • Effectively manage bio-solids and hazardous wastes. • Reduce greenhouse gas emissions. <p>Despite attempts (27/8/21 and 26/10/21 to contact local Indigenous representatives of the Kaurna people, no response has been received to date</p>	
	1.6.2	Initiatives to address shared water challenges shall be identified.	<p>Initiatives to identify shared water challenges have been identified and included in section 2.13 of the WSP</p> <ul style="list-style-type: none"> • Reduced water output by 5.7 million litres • Working with outsource suppliers to implement water savings • The Edinburgh Parks team has participated in a tree planting initiative on 11/06/21 with Salisbury Council and will continue this initiative in-line with council schedules (Burton West – Industrial Drain). Reviewed photo evidence presented at Sustainability meeting 19/7/21 • Reviewed meeting agenda for the above meeting where the WSP was discussed as were initiatives 	
	1.6.3	Advanced Indicator Future water issues shall be identified, including anticipated impacts and trends	Reviewed South Australia Climate Change Risk Assessment that includes the Edinburgh site and includes possible future impacts (water quality).	3
	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.	Future water issues or strategies are identified in section 2.3 and states: As per the Environmental Policy, this commitment extends to:	4

			<ul style="list-style-type: none"> • Development of an environmental management system that is integral to overall management • Prevention of pollution • Continuous environmental improvement • Water, energy and material conservation • The principles of Water Stewardship including good water governance, sustainable water balance, good water quality, status and healthy status of important water related areas • Principles of reduce, re-use, recycle and recover • Developing our people and other resources; and • Working towards sustainability internally and within the supply chain 	
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 future risk trends identified in 1.6	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.	<p>The EMERGENCY PREPAREDNESS & RESPONSE procedure V12 24 Sept 2019. Ss 3.2 outlines a risk management approach</p> <p>Risk management worksheets 3.10.00.02 V 8 22 May 2018 Chemicals on 13/11/20.</p> <p>Emergency Preparedness based on severity a likelihood a low risk was determined. Also, The Amenities Risk Assessment carried out on 16/3/21 determined low risk onsite.</p>	
	1.7.2	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.	<p>Reviewed the WSP section 1.7.1 and 1.7.2 which outlines and prioritises risks and opportunities and also includes how Ingham's have worked with SA Water</p> <p><i>The WSP also states: 1.7.1 and 1.7.2 has been based on the discussions with the site's sustainability team, taking in consideration the sites water risks and opportunities. Reference document – Business Continuity Plan, Environmental Management Plan and Trade Waste Agreement.</i></p>	
1.8 Understand best practice towards achieving AWS outcomes:	1.8.1	Relevant catchment best practice for water governance shall be identified.	<p>. Reviewed section 2.2 of the WSP to evidence</p> <p>1.8.1 Examples of best practice in water governance that comprises of:</p> <ul style="list-style-type: none"> • A comprehensive water stewardship plan that is routinely reviewed and updated 	

Determining sectoral best practices having a local/catchment, regional, or national relevance.			<ul style="list-style-type: none"> • Designating responsibility for water stewardship to senior staff (stated in 2.2) • Training of all employees on the principles of water stewardship and how they can incorporate them within their daily tasks and responsibilities (Record of Toolbox Talk 12/7/21) Also training records for each department • Engaging with peer organizations and stakeholders to promote water stewardship (Engagement Register) • 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 (Stakeholder Register). 	
	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.	<p>The information stated above is then uploaded to PowerBI Planet reporting (operational scorecard) and tracked weekly. Usage, trends and tonnage per usage is reviewed.</p> <p>Water usage is monitored monthly and reported monthly to the national team (Senior leadership Team – Further Processing but also reported quarterly. Reviewed KPIs for FY 21, target was 11KL/t and use was 9.19KL/t, In FY 22 the target has been reduced to 10.2 KL/t and currently usage is at 6.92 KL/t</p>	
	1.8.3	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.	<p>The Quality department complete Micro Testing as per the water testing schedule. These swabs and results are conducted and reviewed by the quality team.</p> <p>Water testing is done on site in response to food safety requirements (customer requirements). The auditor reviewed the Food Safety and Quality Management System, EP Water Swabbing Schedule 2021, which showed overall compliance for the financial year. Requests are received from customers for water quality testing results and referred to the Quality Manager.</p> <p>The samples are sent to the lab for testing, any positive test trigger retesting, the site requires negative results at all times</p> <p>Inwards water is tested by SA water. The auditor confirmed in interview that there is no directly sourced</p>	

			<p>bore water, with all water used on site sourced from SA Water.</p> <p>Trade waste is sampled at the DAF Plant for SA water analysis.</p>	
	1.8.4	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.	No identified- site IWRA	
	1.8.5	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.	<p>Inghams have included a simple statement with qualification that there is no unmet WASH need.</p> <p><i>Note: Adelaide, South Australia has adequate water quality and sanitation and therefore there are no unmet WASH requirements</i></p>	

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	Points Allocated
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	<p>A signed and publicly disclosed site statement OR organizational document shall be identified.</p> <p>The statement or document shall include the following commitments:</p> <p>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.</p>	Reviewed the Ingham's Edinburgh Parks Water Stewardship Sustainability commitment publicly available on the company website www.inghams.com.au	
	2.1.2	<p>Advanced Indicator</p> <p>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.</p>	The Site Commitment- Water Stewardship contains all requirements as set out in 2.1.1	1
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.	<p>Reviewed section 5.1 of the WSP that contains the organisational chart.</p> <p>Reviewed the WSP, section 2.2, that sets out legal requirements, how compliance is met and responsibilities.</p> <p>Implementation of the Water Stewardship Plan and legal compliance is the responsibility of the plant manager, The auditor noted that this can be delegated to other roles in the organization</p> <p>Legal compliance is described in Procedure 2.1 Legal Requirements which includes section 3.2 Maintenance of Legal Requirements database.</p>	

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.	<p>Inghams have identified a Water Stewardship Strategy and Plan.</p> <p>The strategic points are</p> <ul style="list-style-type: none"> • Development of an environmental management • Prevention of pollution • Continuous environmental improvement • Water, energy and material conservation • The principles of Water Stewardship including good water governance, sustainable water balance, good water quality, status and healthy status of important water related areas • Principles of reduce, re-use, recycle and recover • Developing our people and other resources; and • Working towards sustainability internally and within the supply chain 	
	2.3.2	<p>A water stewardship plan shall be identified, including for each target:</p> <p>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.</p>	<p>A Water Stewardship Plan has been developed with targets, metrics, Actions, Relative cost verses benefit, Shared challenges and opportunities, responsible person, who's accountable and start and finish dates.</p> <p>Water Risks and Opportunities (described in pages 30 and 31) sets out risks to Ingham's as well as water opportunities</p>	
	2.3.3	<p>Advanced Indicator</p> <p>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.</p>	<p>The auditor also reviewed photos confirming participation at the tree planting a tree planting initiative on 11/06/21 with Salisbury Council and will continue this initiative in-line with council schedules (Burton West – Industrial Drain).</p> <p>The auditor reviewed photo evidence presented at Sustainability meeting 19/7/21 as well as reviewing the</p>	4

			<p>meeting agenda for the above meeting where the WSP was discussed, as were initiatives.</p> <p>Ingham's Edinburgh works closely with Ingham's Bolivar to share water stewardship knowledge and understanding and to support each sites goals and initiatives.</p>	
	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.	Ingham's water stewardship is spread over three states (South Australia, Victoria and Queensland) and while each site is managed individually there is a Group environmental Manager, based in New Zealand at Ingham's Waitoa site (also AWS certified)	4
	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.	<p>Stakeholder response to the WSP was minimal, however there were three responses received and all were positive, meaning consensus was achieved in relation to the WSP.</p> <p>Stakeholders are identified in the Stakeholder Register, however, there were no alterations to the WSP after consultation as feedback was positive.</p>	4
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.	As Ingham's Edinburgh receives mains delivered water from Water SA there is little opportunity or requirement to identify water related risks, however the auditor was informed of an SA water initiative to trial a pilot "SMART" water programme to water all the ground onsite to overall lower temperatures by the use of the site, reducing water usage.	
	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.	<p>The auditor reviewed the South Australia Climate Change Risk Assessment that includes the Edinburgh site and includes possible future impacts (water quality)</p> <p>This is a national document developed at HO in NSW and applies to all Ingham's South Australia sites.</p>	6

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	Points Allocated
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.	<p>Good catchment governance is realised by way water quality monitored by SA Water and process technicians also monitoring output quality as well as continual electronic water monitoring by Streamwisedi Pty Ltd, a company based in Sydney.</p> <p>The auditor was informed that SA Water were invited to the site and were given a site tour in April 2021 that included DAF plant management, auto sampling and water discharge. The auditor then reviewed an email sent by Ingham's dated 5/5/21 sent after the meeting confirming the subjects discussed.</p> <p>During stakeholder consultations the auditor confirmed that semi regular meetings have been held with SA water – however these have been very restricted in 2020 due to COVID-19 visitor restrictions on site.</p> <p>Ingham's are working with outsource suppliers to implement water savings.</p> <p>The Edinburgh Parks team has participated in a tree planting initiative on 11/06/21 with Salisbury Council and will continue this initiative in-line with council schedules (Burton West – Industrial Drain). Reviewed photo evidence presented at Sustainability meeting 19/7/21</p>	
	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.	<p>Stakeholder consultation is difficult in light of COVID-19 – see previous comments.</p> <p>Reviewed Stakeholder consultation records for 2020 audit period. Both Ingham's and the auditor reached out to the Local Indigenous Peoples representative but has received no response</p>	

	3.1.3	Advanced Indicator Evidence of improvements in water governance capacity from a site-selected baseline date shall be identified.	<p>There have been significant improvements to water governance by way of water usage programmes on site</p> <p>The site recently reduced 5.7 million litres of water per year by thinking outside the box and reviewing the process with our two ovens on site. Water was used to cool the ovens door seals. Our sustainability team was able to trial and then implement operating these ovens without any water for the door seals and this water saving initiative was successful (February 2021).</p> <p>The site has a program whereby all water meters are read and recorded on a daily basis.</p> <p>Water usage is monitored monthly and reported monthly to the national team (Senior leadership Team – further processing on and quarterly. Reviewed KPIs for FY 21 target was 11KL/t and use was 9.19KL/t, In FY 22 the target has been reduced to 10.2 KL/t and currently usage is at 6.92 KL/t</p>	2
	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.	<p>During stakeholder consultations carried out by the auditor stakeholders confirmed that Ingham's are seen as positively contributing to good water governance in the area. This was evidenced by email correspondence in relation to staff attending a tree planting at Kauria Park.</p> <p>Feedback from the landlord who congratulated Inghams offered support for Ingham's AWS certification</p> <p>Further events in 2020 were cancelled due to COVID-19 Restrictions.</p>	2
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.	<p>National Pollution Inventory data is submitted annually, done per site and sent to the EPA. The National Environmental Manager also supplies a regulatory compliance report for Ingham's Enterprises.</p> <p>Reviewed NPI Report for 20/21 Edinburgh Parks FP SA 0463 Financial Year</p>	
	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.	The auditor confirmed that the Department of Environment, EPA and SA Water all set regulatory requirements.	

			<p>Water for Ingham's Edinburgh is sourced only from SA Water.</p> <p>The auditor also confirmed that there are no direct impacts on Indigenous peoples by Ingham's water usage</p>	
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.	<p>Targets for reduced water consumption of the site are lodged in the site's Environmental Management Plan. These targets are reviewed monthly with all further processing sites (Group meeting). Results of the monthly water consumption is also presented to the Supervisors and Team-leaders during the monthly business update.</p> <p>Weekly water reduction targets are set nationally, and the site then decides how they are to achieve it.</p> <p>Water usage is monitored continually, and reported weekly (Weekly Operations Meetings are held on site and data is shared nationally via spreadsheet)</p> <p>For weeks 10-13 of FY 22 (September 2021 Ingham's Edinburgh were 12.18% below targeted water usage.</p> <p>For weeks 1-13 of FY22 Ingham's Edinburgh were 13.81% below targeted usage.</p>	
	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.	N/A Water scarcity is not a site issue.	
	3.3.3	Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.	N/A as no water is re-allocated to social, cultural or environmental needs	
	3.3.4	<p>Advanced Indicator</p> <p>The total volume of water voluntarily re-allocated (from site water savings) for social, cultural and environmental needs shall be quantified.</p>	<p>While this water is not re allocated, Ingham's are seeking a 15% water usage reduction nationally over 5 years. Ingham's are striving to make water reductions onsite. For instance a leak detection and measurement assessment to ensure best practice for water efficiency</p> <p>For weeks 10-13 of FY 22 (September 2021 Ingham's Edinburgh were 12.18% below targeted water usage.</p>	3

			<p>For weeks 1-13 of FY22 Ingham's Edinburgh were 13.81% below targeted usage</p> <p>The site recently reduced 5.7 million litres of water per year by thinking outside the box and reviewing the process with our two ovens on site. Water was used to cool the ovens door seals. Our sustainability team was able to trial and then implement operating these ovens without any water for the door seals and this water saving initiative was successful (February 2021).</p> <p>The site has a program whereby all water meters are read and recorded on a daily basis.</p> <p>As previously stated at the time of audit water target was 10.2KL/t and actual usage was 6.92 (October 2021) and 9.19% lower than the target than the target 11.00KL/T</p>	
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.	<p>Water quality is maintained by SA Water who continually monitor the discharge trade wastewater quality going to the Bolivar Wastewater Treatment Plant. There is an autosampler inside the DAF plant to take samples for SA Water</p> <p>Trade Waste Audit Reports are sent by SA Water to Ingham's quarterly (Reviewed March, June and December 2020 reports which showed zero "Loading over Limits" which would result in higher water discharge costs</p>	
	3.4.2	Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.	Water quality is not a shared water challenge. Water is supplied by SA Water only.	
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.	<p>The site has completed a revegetation (tree planting) program within the catchment area run by the Salisbury Council during June 2021 and will continue to volunteer our services as arranged with the council.</p> <p>An identified threat stated within the Stewardship plan has been that of PFAD contamination from the RAF Base at Edinburgh. Ans is identified as a key challenge, however SA Water have advised that Adams Creek has very low</p>	

			level contamination only and Salisbury Council are working with the Defence Department to remediate contaminated soils and groundwater.	
	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.	N/A at the time of the 2021 audit as projects are underway but not completed (tree planting), however cognisance of efforts by Ingham's staff is noted with revegetation planting is noted by the auditor.	2
	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.	As previously stated in this report the auditor carried out stakeholder consultation confirming that Ingham's are viewed positively, and according to stakeholder responses contribute positively to projects in relation to IWRA in the catchment – Tree planting in Adams Creek and Kaurna Park	2
3.6 Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.	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.	Sanitation and Hygiene on site are considered adequate and there are no unmet WASH needs. A risk assessment covers all staff amenities, and the assessment is available on the internal intranet system Reviewed RA 160321 Risk Management Worksheet Amenities dated 16/3/21	
	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.	Storm water is discharged into a council-controlled water storage wetland prior to being injected into aquifers for future use. All water discharge is managed by Salisbury Council. Stakeholder consultation is undertaken by the auditor did not provide any evidence that the site is impinging on the rights to safe water for any communities.	
	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.	Not applicable as stakeholders not impacted directly by plant.	N/A
	3.6.4	Advanced Indicator	N/A WASH has not a shared water challenge	N/A

		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.		
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.	<p>As previously stated, all water is sourced directly from SA water. Main's water is used for the entirety of the site's water requirements (production and amenities.)</p> <p>The water usage of the upstream process FY21 is as below:</p> <p>Bolivar 1,054,705kL</p> <p>Murraylands Hatchery 31,002kL</p> <p>Breeder Farming 164,888kL (Hamley Bridge 38%, Monarto 28%, Yumali 34%)</p> <p>Feedmilling 22,680kL</p> <p>Out of the above sites, the Bolivar sites within the same Catchment as Edinburgh Parks.</p>	
	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.	<p>Water usage is constantly monitored on-site and discharge to the Trade waste station is controlled by SA Water.</p> <p>Outsourced services were identified as being the off-site laundry services, the WSP states: The laundry is located at Dudley Park (not within the same catchment area) and services the site daily for all uniforms. Currently, all of SA use approximately 1743kg per week. This is based on an average of 8 litres per kilogram and 13,994 litres per week.</p>	
	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.	N/A at this time	N/A
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.	N/A the auditor did not receive any evidence of any concerns from Ingham's in relation to Shared water - related infrastructure	

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.	<p>Environmental Management Daily Environmental Checklist 31/5/21 For site including water related issues e.g. keeping water overflow drains clear.</p> <p>The auditor confirmed that the actions to achieve best practice towards AWS outcomes and water governance are evidenced by the reduction in processing water usage</p> <p>For weeks 10-13 of FY 22 (September 2021 Ingham's Edinburgh were 1218% below targeted water usage.</p> <p>For weeks 1-13 of FY22 Ingham's Edinburgh were 13.81% below targeted usage</p> <p>As previously stated at the time of audit water target was 10.2KL/t and actual usage was 6.92 (October 2021) and 9.19% lower than the target than the target 11.00KL/T</p>	
	3.9.2	Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.	<p>Page 37 of the WSP sets out Water Stewardship Objectives and includes some projects already completed: I.e: Review door cooling on ovens (5.7 million litre savings per year)</p> <p>Nonconformance Not all projects set out in the WSP have person responsible and start/finish dates of the projects stated</p>	
	3.9.3	Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.	<p>The Quality department complete Micro Testing as per the water testing schedule. These swabs and results are conducted and reviewed by the quality team. Water testing is done in response to food safety requirements (customer requirements).</p> <p>Reviewed the Food Safety and Quality Management System, EP Water Swabbing Schedule 2021 which showed overall compliance for the financial year. Requests are received from customers to the Quality Manager.</p> <p>The samples are sent to the lab for testing, any positive test trigger retesting, the site requires negative results at all times</p>	

			Inwards water is tested by SA water. The auditor confirmed in interview that there is no directly sourced bore water, with all water used on site sourced from SA Water mains supply. Trade waste is sampled at the DAF Plant for SA water analysis.	
	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.	The site has completed a revegetation program within the catchment area run by the Salisbury Council during June 2021 and will continue to volunteer our services as arranged with the council.	
	3.9.5	Actions towards achieving best practice related to targets in terms of WASH shall be implemented.	Inghams have included a simple statement with qualification that there is no unmet WASH need. <i>Note: Adelaide, South Australia has adequate water quality and sanitation and therefore there are no unmet WASH requirements</i>	
	3.9.6	Advanced Indicator Achievement of identified best practice related to targets in terms of good water governance shall be quantified.	There have been a significant improvement to water governance by way of water usage programmes on site, for instance: The site recently reduced 5.7 million litres of water per year by thinking outside the box and reviewing the process with our two ovens on site. Water was used to cool the ovens door seals. Our sustainability team was able to trial and then implement operating these ovens without any water for the door seals and this water saving initiative was successful (February 2021). The site has a program whereby all water meters are read and recorded on a daily basis.	4
	3.9.7	Advanced Indicator Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified.	Water usage is monitored monthly and reported monthly to the national team (Senior leadership Team – further processing on and quarterly. Reviewed KPIs for FY 21 target was 11KL/t and use was 9.19KL/t. In FY 22 the target has been reduced to 10.2 KL/t and currently usage is at 6.92 KL/t As previously stated in this report, for weeks 10-13 of FY 22 (September 2021 Ingham's Edinburgh were 12.18% below targeted water usage.	8

			<p>For weeks 1-13 of FY22 Ingham's Edinburgh were 13.81% below targeted usage</p> <p>Also, at the time of audit water target was 10.2KL/t and actual usage was 6.92 (October 2021) and 9.19% lower than the target than the target 11.00KL/T</p>	
	3.9.8	Advanced Indicator Achievement of identified best practices related to targets in terms of water quality shall be quantified.	<p>The Quality department complete Micro Testing as per the water testing schedule. These swabs and results are conducted and reviewed by the quality team. Water testing is done in relation to food safety requirements (customer requirements).</p> <p>Reviewed the Food Safety and Quality Management System, EP Water Swabbing Schedule 2021 which showed overall compliance for the financial year. Requests are received from customers to the Quality Manager.</p>	4
	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.	<p>Inghams Edinburgh impact on IWRA is only via water discharge to the Bolivar Trade Wastewater Treatment Plant</p> <p>At the time of the 2021 audit projects are underway but not completed (tree planting) however cognisance of efforts by Ingham's staff is noted with revegetation planting noted</p>	3
	3.9.10	Advanced Indicator Achievement of identified best practice related to targets in terms of WASH shall be quantified.	N/A at the time of the 2021 audit	
	3.9.11	Advanced Indicator A list of efforts to spread best practices shall be identified.	N/A at the time of the 2021 audit	
	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.	N/A at the time of the 2021 audit	
	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	N/A at the time of the 2021 audit	

		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.		
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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	Points Allocated
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.	Non conformance At the time of the evaluation this is partially completed with goals and some targets described, however it does not state how this has contributed to achieving the five AWS Outcomes.	
	4.1.2	Value creation resulting from the water stewardship plan shall be evaluated.	Non conformance Ingham's have identified some water related costs (DAF Plant) and trade waste however the company has not provided a cost-benefit analysis or included consideration of improving natural capital or ecosystem services	
	4.1.3	The shared value benefits in the catchment shall be identified and where applicable, quantified.	Non conformance The reduction in water usage, communication and extended consultation with stakeholders in relation to water usage at Ingham's Edinburgh are seen as value benefits in the catchment, however these are not clearly quantified or how/if the company can report on the value benefit to others in the catchment.	
	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.	N/A not undertaken at this time	N/A
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.	Reviewed the Emergency Preparedness and Response procedure V12 dated 24 Sept 2019. Ss 3.2 outlines a risk management approach 3.2.1 Coordination with other Agency Plans. The ECO is to consider its emergency management plan and procedures in conjunction with all emergency plans developed by other relevant agencies.	

			<p>BUSINESS CONTINUITY PLANNING – EDINBURGH PARK FFP V2 27/11/2018 outlines critical processes including water and wastewater management. Risk mitigations are laid out.</p> <p>Non conformance No annual review and (where appropriate) a root cause analysis has been carried out to date. The auditor is aware that Inghams Edinburgh may carry out reviews as part of meetings.</p>	
4.3 Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.	4.3.1	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.	<p>The auditor reviewed the Stakeholder consultation database which clearly showed the company has an active approach to stakeholder consultation. However, consultation has been severely constrained within the audit period due to COVID-19 site restrictions. No visitors allowed on site for much of 2021</p> <p>Online meetings SA Water) have continued.</p> <p>Evidence of the WSP being emailed to stakeholders prior to the audit was verified by the auditor.</p> <p>Non conformance No consideration of stakeholder feedback seen in the Stakeholder register</p>	
	4.3.2	<p>Advanced Indicator</p> <p>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.</p>	<p>N/A at the evaluation, this will be evaluated at the first surveillance audit See 4.3.1</p>	N/A
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.	<p>The Water Stewardship Plan referred to throughout the audit is stated as version 1 and is dated October 2021.</p> <p>Ingham's reported that they have reviewed the WSP during the draft implementation and pre-audit Gap Analysis</p> <p>The auditor was also informed that evaluation of the WSP will occur prior to the first surveillance audit.</p>	

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	Points Allocated
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.	<p>The WSP includes an Organisational Chart on Page 42 and the Site Management commitment – Water Stewardship is available on the company website https://Ingham's.com.au/our-purpose/planet/</p> <p>Nonconformance Reporting of the stewardship performance including quantified performance against targets requires reviewing to improve performance reporting.</p>	
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.	<p>The Water Stewardship Plan has been shared with SA Water, Salisbury Council and the Department of Environment and Water via email correspondence.</p> <p>The auditor reviewed email correspondence to all stakeholders that contained a copy of the WSP emailed on the 26th October 2021 and included the representative of the Kurna people (no response received).</p> <p>Stakeholder consultation undertaken by auditor confirmed that the WSB was received by stakeholders and viewed positively.</p>	
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.	<p>Non conformance Edinburgh Parks has not included a public disclosure as other Ingham sites have done</p>	
	5.3.2	<p>Advanced Indicator The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report.</p>	The Ingham's FY 21 Annual Report, page 15, states that Ingham's have pioneered an international Alliance for Water Stewardship framework and have improved water usage by (companywide) tracked through the company Planet Key Performance Indicators being the only certified poultry processor in the world	1

	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.	As this is the evaluation only no mention was made of Ingham's Edinburgh being included in the certified sites (Te Aroha, Murrarie, Bolivar and Somerville)	0
5.4 Disclose efforts to collectively address shared water challenges, including: efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.	5.4.1	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.	The site, through its key stakeholders being SA Water, City of Salisbury, EPA and a number of other interested parties will present its plans to contribute its efforts to address shared water challenges prior to the first surveillance audit. Reviewed Planet Reporting of water usage for FY 21 and FY22 See NCR at 5.3.1	
	5.4.2	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.	Efforts to engage stakeholders in 2021 have been limited and inter- personal contacts have been very significantly curtailed due to site COVID-19 requirements not allowing people on site and also not allowing offsite meetings etc. Inghams Edinburgh will present a meeting schedule	
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.	The site reports any violations in relation to water related compliance as a requirement of the site's licencing conditions with Environmental Protection Agency. There have been no known violations to report.	
	5.5.2	Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.	There have been no known violations to report.	
	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 known violations to report.	
TOTAL POINTS ALLOCATED				69

END OF REPORT

