

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

<b>Client Name:</b>	Ingham's Enterprises Pty Limited
<b>Audit date(s):</b>	8 <sup>th</sup> and 9th October 2015
<b>Audit location:</b>	Grant Road, Somerville VIC
<b>Audit report completed by:</b>	Kevin OGrady
<b>Report issue date:</b>	This is the date that the report is issued to the client
<b>Proposed date of next audit:</b>	July 2016

**Introduction to the Alliance for Water Stewardship**

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

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

**Disclaimer**

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

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

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

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

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

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

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

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

### Major Non-Conformities

A major non-conformity is raised if:

The issue represents a systematic problem of substantial consequence;

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

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

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

### Minor Non-Conformities

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

### AWS NCR Scheme Rules

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

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

Note: If corrective actions are inadequate to resolve a minor non-conformity by the time of the next scheduled audit, the CAB shall upgrade the audit finding to a major non-conformity.

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

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

**Opportunity for Improvement**

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

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

DRAFT

# 1. Client and Certificate Details

## Client & Site Details

Address of certified operation:

Grants Road, Somerville

Management representative:

Hudson Cameron Manager Advanced Water Treatment, Julia Seddon Group Head of Sustainability.

Contact email address:

Contact phone number:

Website address:

www.ingham.com.au

## BM TRADA Certificate Details

Type of certificate:

Single site

AWS Reference number:

Date of first certification:

Current Certificate start date:

Current Certificate expiry date

# 2. Details of Audit and Scope of Certification

## Audit Details

Audit type:

Initial

Surveillance

Re-certification

Audit team and roles:

Kevin OGrady Lead Auditor  
Rod Knight Auditor  
David Tiller – Catchment specialist and technical advisor.

Standard:

The AWS International Water Stewardship Standard Version V1.0 April 8<sup>th</sup> 2014

## Scope of Certification

**Scope of Certification:**

Water Stewardship in slaughter and processing of Poultry.

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

Watson Creek 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. Watson creek has been highly modified, with the natural channel form changed by channelization and loss of wetlands that once were common on its floodplain.

The catchment was almost entirely cleared for grazing and horticulture and in more recent times urbanization has increased substantially. The riparian zone for much of its length is in poor condition and generally dominated by weeds. 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.

**Summary of shared water challenges :**

Water challenges in the Watsons Creek catchment include; excessive nutrients, low dissolved oxygen, sedimentation, morphological changes, weeds and altered flow regime.

Nutrients are believed to be the major concern as they lead to excessive in-stream plant growth and subsequently low dissolved oxygen levels. Nutrients largely arise from agriculture (including market gardens), erosion in the catchment and the unstable bed and banks of the creek. Organic loads from urban stormwater would also contribute to low dissolved oxygen.

Nutrient loads are also likely to be having an impact on Yaringa Marine Park. While agriculture has been the major contributor of contaminants, particularly nutrients and sediment, to Watsons Creek, the ever-expanding urban areas in the catchment are likely to be a major future threat. Stormwater management will become an even more important issue in future.

Restoring the riparian zone will assist in reducing nutrient and sediment loads to the creek and Western Port and will also improve ecological health and assist in the restoration of a more natural stream morphology and flow regime.

## 3. Executive Summary

### Main processes / Activities / Places Inspected

Main processes/ activities / places inspected (including names & affiliations of people consulted)	Number of NCRs
Site and office Principle 1 COMMIT	
Site and office Principle 2 GATHER AND UNDERSTAND Hudson Cameron, Julia Seddon	5
Site and office Principle 3 PLAN Hudson Cameron, Julia Seddon	1
Site and office Principle 4 IMPLEMENT Hudson Cameron, Julia Seddon	1
Site and office Principle 5 EVALUATE Hudson Cameron, Julia Seddon	1
Site and office Principle 6 COMMUNICATE AND DISCLOSE Hudson Cameron, Julia Seddon	2
<b>Total number of nonconformities issued at this audit:</b>	10

## Previous NCR(s)

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

Yes

No X

## Allocation of points and Lead Auditor Recommendations

Core Criteria. Subject to NCRs being closed out the recommendation is to award all points under core certification criteria.

Advanced Criteria: (points)

1.3 3

1.4 3

1.5 1

Sub Tot 7

2.8 4

2.11 0 (7)

Sub Tot 4 (11)

3.5 7

Sub Tot 7

4.9 8

4.10 0 (8)

4.11 8

4.12 0 (8)

4.15 8

Sub tot 14 max (14 max)

4.17 3

Sub Tot 17 (17)

5.5 0 (3)

Sub Tot 0 (3)

Grand total 35 (45)

Evidence referred to can be accessed (Link) includes but is not limited to:

Gen - "Inghams Somerville Water Stewardship Site Assessment 2015"

Gen - "Site Water Plan – Water Stewardship 2015" = WS policy

Other evidence accessed but not available includes:

Gen - "Environmental Management Plan Somerville Sept 2015"

Gen – "Safe Working Plan" – think this includes the Environmental Walk

1.4 Invoice for cash contribution to Western Port Water Stewardship project

1.4 Spreadsheet of expenditure on the Water Sensitive Rural Lands project with Mornington Peninsula Council

2.1.3, 2.3.1, 2.3.5 "Western Port Catchment Analysis" and Indicators Report

2.2.1, 4.8.1 "Somerville Water Stewardship PPP Stakeholder List 2015"

2.2.1 Email confirming engagement with indigenous stakeholders

2.2.1 Letter to neighbours of "Changed hours of operation"

2.3.3 South East Water 2013-2018 Water Plan

2.3.6 South East Water Drought Plan 2012

2.3.6 South East Water Corporate Plan 2015-2020

2.4.1 Emergency Response Plan

2.4.2 "AWTP Daily Flows Totals" spreadsheet

2.4.3 "AWTP Inghams Somerville Results Master" spreadsheet  
 2.4.3 "Melbourne Water Watson Creek quality results 2012-2014" spreadsheet  
 2.4.4 "SDS May 2015 DG Haz Substances" spreadsheet  
 2.4.6 "Somerville Sustainability Report 29Sep2015"  
 2.4.6 "Somerville PPP Water Treatment Actual Costs" (spreadsheet?)  
 2.4.6 "Somerville PPP Processing Actual Costs 2014-2015" (spreadsheet?)  
 2.4.6 "KPI Performance Indicators Actual 2014-2015"  
 2.5.1 "Vic Farming Sustainability Report Aug 2015" spreadsheet  
 2.5.1 Journal article of "Cradle to retailer" life cycle assessment  
 2.6.1 "Somerville PPP Water Stewardship Shared Water Challenges 2015"  
 2.7.1 "Somerville PPP Water Stewardship Risks 2015"  
 2.7.2 "Somerville PPP Water Stewardship Opportunities 2015"  
 ?? 3.2.1 "Inghams Environmental Policy EMP + WS 2015"  
 ?? 3.2.2 "Water Stewardship Plan Somerville 2015" – I've this as a separate doc??  
 3.4.1 "Port Phillip and Western Port Regional Catchment Strategy"  
 3.3.1 "Sludge Management Plan" (3.3.1)  
 3.5.1 Western Creek Water Stewardship Project Steering Group minutes (demonstrating consensus 3.5.1)  
 4.4.1, 4.4.2 Mornington Shire Council Water Sensitive Rural Lands project sign off letter (4.4.1, 4.4.1) "WSRL Program Grant Ref MWPI1001 – FGL"  
 4.6.1 Watson Creek Catchment Group meeting minutes 22 Oct 2014  
 4.9.2 Letter from South East Water identifying the AWTP as 'best practice'  
 4.10.2 AWTP design report (demonstrates change from baseline)  
 4.11.2 "MPLN email re WSRL Grant Nov 2014"  
 4.15.1 Project report identifying 6 new partners in the Watson Creek (or is that Western Port) project  
 4.15.2 "Inghams WS letter from WP Biosphere 1Oct2015"  
 4.15.3 – There was a document mentioned for this – possibly newspaper report of activity with local school  
 2.4.1 Incident documents – Incident Reporting Form, Incidence Response Procedure and Incident Reporting Investigation Procedure (4.03.01).

**Note:** the above recommendation is subject to review and (continued) Certification / Recertification decision.

### Allocation of Points

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

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

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

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

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

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

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

Table 2. Thresholds for AWS Certification Levels.

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

## 4. Audit Observations, Findings and Conclusions

### Description of Operation

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

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

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

Integrated operations include:

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

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

Inghams Somerville primary processing plant was originally a Golden Poultry site constructed in the late 1960s. Ingham purchased the site from Golden Poultry in 1976. The facility was rebuilt following the majority of the processing portion of the original plant being destroyed by fire in January 2010. Approximately 570 staff are employed at Somerville PPP.

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 65% of the total water used on site and uses the advanced water in the factory for wash water.

### Documented Procedures

#### Step 1 – COMMIT

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

**Core criteria**

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

Core Criteria	Indicators	Response Area
<p><b>1.1 Establish a leadership commitment on water stewardship:</b></p> <p>Have the senior-most manager at the site, and if necessary a suitable individual within the corporate head office, sign and publicly disclose a commitment to:</p> <ul style="list-style-type: none"> <li>• Uphold the AWS water stewardship outcomes (good water governance, sustainable water balance, good water quality status and healthy status of Important Water-Related Areas);</li> <li>• Engage stakeholders in an open and transparent manner;</li> <li>• Strive to comply with legal and regulatory requirements</li> <li>• Respect water-related rights, including ensuring appropriate access to safe water, sanitation and hygiene for all workers in all premises under the site's control;</li> <li>• Support and coordinate</li> </ul>	<p><b>1.1.1 Signed and publicly disclosed statement that explicitly covers all requirements (see details in Criterion 1.1).</b></p>	<p><b>Signed documents demonstrated commitment to water stewardship and covers the requirements in 1.1.</b></p> <p><b>Environmental Policy documents for three operation areas signed 21 April 2015 by Executive Chairman, Mick McMahon.</b></p> <ul style="list-style-type: none"> <li>• Site Commitment document signed by Plant Manager Steve Walters Sep 2015 displayed in foyer of administration building of Somerville site</li> <li>• Site Commitment document endorsed by Executive Chairman Mick McMahon Oct 2015.</li> </ul>

<p>with public sector agencies in the implementation of plans and policies, including working together towards meeting the human right to water and sanitation.</p> <ul style="list-style-type: none"> <li>• Continually improve and adapt the site's water stewardship actions and plans;</li> <li>• Maintain the organizational capacity necessary to successfully implement the AWS Standard, including ensuring that staff have the time and resources necessary to undertake the implementation;</li> <li>• Support water-related national and international treaties;</li> <li>• Disclose material on water-related information to relevant audiences.</li> </ul>		
<p><b>1.2 Develop a water stewardship policy:</b></p> <p>Develop an internally agreed-upon and communicated and publicly available water stewardship policy that references the concept of water stewardship (as informed by the AWS Standard, outcomes and criteria).</p>	<p><b>1.2.1 Publicly available policy that meets all requirements (see Guidance)</b></p>	<ul style="list-style-type: none"> <li>• Policy "06-POL-ENVIRON" dated 21 April 2015. This is in the EMS. This is an AWS specific document displayed in the foyer at each region and on the company web site. <a href="http://www.ingham.com.au/media/uploads/files/WS_Comittment_Somerville_PPP_2015.pdf">http://www.ingham.com.au/media/uploads/files/WS_Comittment_Somerville_PPP_2015.pdf</a></li> <li>• Environmental Policy is scheduled for automatic review 21 April 2018</li> <li>• Environmental Policy for Southern Region (covers Somerville Site) is counter signed by Des Hindson Southern Region Operations Executive General Manager in addition to the Executive Chairman</li> <li>• Policy clearly states that the implementation of the policy is the responsibility of all personnel</li> <li>• The policy is available on the Ingham intranet to staff and relevant management and staff such as the site Sustainability Committee are aware of the policy</li> <li>• Site Manager has signed a personal commitment to goals and principles of Water Stewardship (TBA), Executive Chairman has endorsed same commitment.</li> </ul>

## Advanced criteria

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

Advanced Criteria	Indicators	Response Area
<p><b>1.3 Further the alliance for Water Stewardship</b></p> <p>Commit to an AWS training programme or commit to AWS membership or get a commitment from one or more other sites to implement an AWS programme (membership, standard &amp; certification or training).</p>	<p><b>1.3.1 Official registration with AWS</b></p>	<p>Inghams Somerville site has committed to a number of water related initiatives, including:</p> <ul style="list-style-type: none"> <li>• Inghams has been and continues to be a key supporter of WSA through the active support of Julia Seddon, Head of Business Sustainability who was involved in development of finalised AWS standard released in 2014</li> <li>• Preliminary Water Stewardship commitment and development begun in 2013 with interim plan and self-assessment completed then</li> <li>• Somerville site AWTP Manager Hudson Cameron attended Advanced level WSA training in 2015 in Brisbane</li> <li>• Inghams Somerville are currently partnering with the Westernport Biosphere Foundation NGO to develop Water Stewardship projects with other businesses and organisations in the Watson Creek Catchment.</li> <li>• The Ingham Somerville site is a participating member of the Watson Creek Catchment</li> </ul> <p>(sighted acknowledgement letter from Western Port Biosphere thanking Inghams for this initiative)</p> <p>Group, a local Landcare group committed to improving the quality of the water and broader catchment of the Watson Creek that is adjacent the site.</p> <ul style="list-style-type: none"> <li>• Inghams Somerville site intend to achieve Water Stewardship accreditation by audit in October 2015</li> </ul>
<p><b>1.4 Commit to other initiatives that advance effective water stewardship</b></p> <p>Commit to additional, voluntary and complementary water-related initiatives. Qualifying initiatives must:</p> <ul style="list-style-type: none"> <li>• Be voluntary in nature;</li> <li>• Be commonly accepted as best practices or processes for effective water management;</li> <li>• Explicitly contain references to water (even if this is not their primary purpose);</li> <li>• Contain a time-bounded commitment for taking action to improve use of water resources;</li> <li>• Not be redundant with existing requirements from the AWS Standard (i.e., the site cannot get</li> </ul>	<p><b>1.4.1 Formal commitment to qualifying initiative(s), including a timeline for completion</b></p>	<p>Initiatives are in place.</p> <ul style="list-style-type: none"> <li>• 2007 Signed a stakeholder led multi-member agreement to look for ways to improve Watson Creek quality (now completed).</li> <li>• Advanced Water Treatment Plant on site at Somerville to treat wastewater to drinking water level, producing advanced water. Built in 2011.</li> <li>• Program to plant native vegetation along Watson Creek banks. (sighted grant approval and expenditure)</li> <li>• Partnered with Mornington Peninsula Shire to complete a Water Sensitive Rural Land improvement project in 2014/15</li> <li>• The AWTP goal is to maintain and if possible improve advanced water productivity thereby improving water intensity. Goals are set annually through the site Environmental Management Plan (EMP) (Goals and results over 3 years seen)</li> <li>• Ingham has partnered with Westernport Biosphere and local stakeholders for catchment based Water Stewardship Project on Watson Creek the waterway adjoining the site.</li> <li>• The AWTP trade waste limits are designed to enable the authority (South East Water) to provide recycled water for irrigation in times of water scarcity or drought by maintaining a maximum daily discharge limit for sodium</li> </ul> <p>(Sighted a spreadsheet of expenditure on these Water Stewardship related projects.)</p>

<p>credit for commitments that would have been already required by the AWS Standard);</p> <ul style="list-style-type: none"> <li>Intend to deliver additional social or environmental benefits, keeping with the definition of water stewardship.</li> </ul>		
<p>1.5 Secure a water stewardship commitment from the organization's senior most executive or the organization's governance body</p> <p>The site's commitment in 1.1 is also signed off by the senior-most executive in the organization or the overarching governance body that oversees the site's organization.</p>	<p>1.5.1 Appropriately signed and publicly available statement that explicitly covers all requirements (see details in Criterion 1.1)</p>	<p>•Site Commitment document endorsed by Executive Chairman Mick McMahon Oct 2015 displayed in foyer of administration building of Somerville site</p>
<p>1.6 Prioritize communities' rights to water</p> <p>The site publicly commits that if the human right to water and sanitation is unmet, and if requested by the community, the site will provide direct assistance from its own allocations of 20L per person to assist communities for their water-related needs.</p>	<p>1.6.1 Signed and publicly disclosed statement that explicitly covers all requirements</p>	<p>Not Assessed</p>

## **Step 2 – GATHER AND UNDERSTAND**

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

### **Core criteria**

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

Core Criteria	Indicators	Response Area
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<p><b>2.1 Define the physical scope</b></p> <p>Identify the site's operational boundaries, the sources the site draws its water from, the locations where the site returns its discharge to, and the catchment(s) that the site affect(s) and is reliant upon.</p>	<p><b>2.1.1 Documentation or map of the site's boundaries</b></p> <p><b>2.1.2 Names and location of water sources, including both water service provider (if applicable) and ultimate source water</b></p> <p><b>2.1.3 Names and location of effluent discharge points, including both water service provider (if applicable) and ultimate receiving water body</b></p> <p><b>2.1.4 Geographical description or map of the catchment(s)</b></p>	<p><b>2.1.1</b> A map of the sites boundaries is included in the document "Environmental Management Plan Somerville – September 2015"</p> <p><b>2.1.2</b> The name and location of water sources is described generally in the South East Water Corporation document "Where does my water come from?", but there is a lack of clarity as to the ultimate water source as it can be from anywhere in the wider catchment and this is not stated in the document.</p> <p><b>NCR 01 minor</b> There is a lack of clarity as to the ultimate water source (see guidance note 2). The ultimate source is not able to be clearly defined as it can be from anywhere in the wider catchment but this is not stated in the document.</p> <p><b>2.1.3</b> 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. Effluent discharge is summarised in the document 'Western Port Catchment "WSA Western Port Catchment Indicator Analysis 2015", v3 and v3 supplementary report. The requirement is met.</p> <p><b>2.4</b> The site is part of the local catchment of Watson Creek and its water supply is part of the much larger reticulated Melbourne Water catchment and can included desalinated sea water. The larger catchment is shown in the South East Water document "Where does my water come from". A geographical description of the Watson Creek is included in the site Environmental Management Plan and a map in the document "Western Port Catchment "WSA Western Port Catchment Indicator Analysis 2015", v3 and v3 supplementary report.</p>
<p><b>2.2 Identify stakeholders, their water-related challenges and the site's sphere of influence</b></p> <p>Identify stakeholders, document their water-related challenges and explain how the stakeholders are within the site's sphere of influence.</p>	<p><b>2.2.1 List of stakeholders, descriptions of prior engagements and summaries of their water-related challenges</b></p> <p><b>2.2.2 Description of the site's sphere of influence</b></p>	<p><b>2.2.1</b> The "Somerville PPP Water Stewardship Stakeholder List 2015" contains a list of stakeholders, engagement and shared water challenges. The Environmental Management Plan contains a map and names of neighbours of the site, and letters demonstrating engagement were provided. However, the neighbours are not</p>

		<p>included in the stakeholder list and indigenous stakeholders are not identified.</p> <p><b>NCR 02 Minor</b> The Stakeholder list does not include in immediate neighbours for the site and the local indigenous stakeholders are not included in the list.</p> <p>2.2.2 The Stakeholder List contains a list of stakeholder's ability to influence or be influenced. The site's Self-Assessment describes the sites sphere of influence as shown in Figure A5 of the Guidance. The requirement is met.</p>
<p><b>2.3 Gather water-related data for the catchment</b> Gather credible and temporally relevant data on the site's catchment:</p> <ul style="list-style-type: none"> <li>• Water governance, including catchment plan(s), water-related public policies, major publicly led initiatives under way, relevant goals, and all water-related legal, regulatory requirements;</li> <li>• Water balance for all sources while considering future supply and demand trends;</li> <li>• Water quality for all sources while considering future physical, chemical and biological quality trends;</li> <li>• Important Water-Related Areas, including their identification and current status, while considering future trends;</li> <li>• Infrastructure's current status and exposure to extreme events while considering expected future needs</li> </ul>	<p><b>2.3.1 List of relevant aspects of catchment plan(s), significant publicly led initiatives and/or relevant water related public policy goals for the site</b></p> <p><b>2.3.2 List, and description of relevance, of all applicable water-related legal and regulatory requirements, including legally defined and customary water rights and water-use rights</b></p> <p><b>2.3.3 Catchment water balance by temporally relevant time unit and commentary on future supply and demand trends</b></p> <p><b>2.3.4 Appropriate and credibly measured data to represent the physical, chemical and biological status of the site's water source(s) by temporally relevant time unit, and commentary on any anticipated future changes in water quality</b></p> <p><b>2.3.5 Documentation identifying Important Water Related Areas, including a description of their current status and commentary on future trends</b></p> <p><b>2.3.6 Existing, publicly available reports or plans that assess water-related infrastructure, preferably with content exploring current and projected sufficiency to meet the needs of water uses in the catchment, and exposure to extreme events</b></p>	<p><b>2.3.1</b> The company is involved in the Western Port Bay Biosphere project. The project document "Water Stewardship Australia Western Port Catchment Analysis" lists public policies and initiatives that meet the requirement.</p> <p><b>2.3.2</b> The Environmental Management Plan for the site contains a list of applicable Acts (pp38-39) and legally defined water licenses (p36). The catchment expert identified some applicable legislation which is not listed (e.g. <i>Water Act 1989</i>). It was reported that there are no extant customary water rights, but this is not reported in the Environmental Management Plan.</p> <p>Advice given by catchment expert that not all relevant Acts and Regulations are listed</p> <p><b>Observation 01</b> In the list of relevant acts and regulations the following are missing. <b>Water Act:</b> Government of Victoria (2010). Version No. 099B, Water Act 1989, No. 80 of 1989. Version incorporating amendments as at 28 October 2010 <b>Flora and Fauna Guarantee Act:</b> Government of Victoria (2007). Version No. 035, Flora and Fauna Guarantee Act 1988, No. 47 of 1988. Version incorporating amendments as at 5 October 2007 <b>SEPP WoV:</b> Government of Victoria (2003). Variation To State Environment Protection Policy (Waters of Victoria). Victoria Government Gazette No. S 107. 2003. Victorian Government Printer, Melbourne, Australia. <b>SEPP (WoV) schedule F8 Westernport:</b></p>

		<p>Government of Victoria (2001). Variation To State Environment Protection Policy (Waters of Victoria) - Insertion of Schedule F8. Western Port and Catchment. Victoria Government Gazette No. S 192. 2001. Victorian Government Printer, Melbourne, Australia.</p> <p>4.2.2:</p> <p>Observation 02 There is no statement that there are no extant customary rights involved.</p> <p>2.3.3 Melbourne Water publishes an annual water balance for the catchment, and a daily breakdown of water storages and changes. The “Western Port Catchment Analysis” references a 2013 Melbourne Water report which assesses (then) future supply for 2014. The South East Water “2013-2018 Water Plan” provides commentary on future supply and demand trends.</p> <p>2.3.4 The regulated supply of potable water to the site meets the requirement for appropriate and credibly measured water quality data. The site Self-Assessment identified South East Water’s website of real time water quality analysis. However, documentation for the site does not address potential future changes to water quality. The requirement is not met.</p> <p>2.3.5 The “Western Port Catchment Analysis identifies Important Water Related Areas in in the Watson Creek catchment and identifies sources of information. However the commentary on future trends is inadequate.</p> <p>NCR 03 minor (2.3.4 and 2.3.5) There is a need to ask Southeast water how they assess potential future challenges to water quality and important water related areas. Ingham’s need to consider how they incorporated this information into their Water Stewardship system.</p> <p>2.3.6 The Western Port “Catchment Indicators Analysis supplement” contains a list of Bureau of Meteorology National Water Accounts for Melbourne, and includes infrastructure information for the catchment. The South East Water “Drought Response Plan 2012” and “Corporate Plan 2015-2020” address drought as the major extreme event for the catchment.</p>

<p><b>2.4 Gather water-related data for the site</b></p> <p>Gather credible and temporally relevant data on the site's:</p> <ul style="list-style-type: none"> <li>• Governance (including water stewardship and incident response plan);</li> <li>• Water balance (volumetric balance of water inputs and outputs);</li> <li>• Water quality (physical, chemical and biological quality of influent and effluent) and possible sources of water pollution;</li> <li>• Important Water-Related Areas (identification and status);</li> <li>• Water-related costs (including capital investment expenditures, water procurement, water treatment, outsourced water-related services, water-related R&amp;D and water-related energy costs), revenues and shared value creation (including economic value distribution, environmental value and social value).</li> </ul>	<p><b>2.4.1 Copies of existing water stewardship and incident response plans</b></p> <p><b>2.4.2 Site water balance (in Mm3 or m3) by temporally relevant time unit and water-use intensity metric (Mm3 or m3 per unit of production or service)</b></p> <p><b>2.4.3 Appropriate and credibly measured data to represent the physical, chemical and biological status of the site's direct and outsourced water effluent by temporally relevant time unit, and possible pollution sources (if noted)</b></p> <p><b>2.4.4 Inventory of all material water-related chemicals used or stored on-site that are possible causes of water pollution</b></p> <p><b>2.4.5 Documentation identifying existing, or historic, onsite Important Water-Related Areas, including a description of their status</b></p> <p><b>2.4.6 List of annual water-related costs, revenues and description/quantification of social, environmental or economic value generated by the site to the catchment</b></p>	<p><b>2.4.1 The Water Stewardship Plan for the site is included in the Environmental Management Plan. The site "Incident Procedure", "Incident Response Plan", "Emergency Response Plan" and "Business Continuity Plan" meet the requirements for incident response.</b></p> <p><b>2.4.2 A yearly summary of water balance by sector of operation was provided in the "QA HACCP" document</b></p> <p>Daily water balance and monthly summaries are available back to the commissioning of the new plant in 2011. The "AWTP Daily Flow Totals" spreadsheet conforms to the definition of site water balance.</p> <p><b>2.4.3 The "AWTP Ingham's Somerville Results Master" spreadsheet contains water quality measurement data as specified in the Trade Waste Agreement with South East Water. The "Melbourne Water Watson Creek quality results 2012-2014" spreadsheet also shows upstream and downstream water quality data for Watson Creek based on monthly sampling. The site stormwater outlet to Watson Creek is a possible pollution source but is not specifically identified.</b></p> <p><b>2.4.4. The spreadsheet "SDS May 2015 DG Haz Substances" contains a comprehensive register and inventory of chemicals used at the site but does not identify water-related chemicals, those that are possible sources of pollution, or where they are stored on site.</b></p> <p><b>NCR 04 minor.</b> There is a comprehensive and inventory of chemicals but this does not indicate which of the chemicals are water related and possible pollution sources or where they are stored on site.</p> <p><b>2.4.5 The Environmental Management Plan for the site contains a list and map of Important Water Related Areas. Staff also identified a recently identified area of indigenous cultural significance which will be added to the next update of the Plan.</b></p> <p><b>2.4.6 Extensive data on the water-related costs and revenues for the site and catchment were provided in the "Somerville Sustainability Report 29Sep2015" (weekly report), "Somerville PPP Water</b></p>
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<p>2.5 Improve the site’s understanding of its indirect water use</p> <p>Identify and continually improve the site’s understanding of:</p> <ul style="list-style-type: none"> <li>• Its primary inputs, the water use embedded in the production of those primary inputs and, where their origin can be identified, the status of the waters at the origin of the inputs;</li> <li>• Water used in outsourced water-related services within the catchment.</li> </ul>	<p>2.5.1 List of primary inputs with their associated embedded annual (or better) water use and (where known) their country/region/or catchment of origin with its level of water stress</p> <p>2.5.2 List of outsourced services that consume water or affect water quality and both (A) estimated annual (or better) water withdrawals listed by outsourced services (Mm3 or m3) and (B) appropriate and credibly measured data to represent the physical, chemical and biological status of the outsourced annual (or better) water effluent</p>	<p>2.5.1 The “Vic Farming Sustainability Report Aug 2015” spreadsheet shows water use at 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 (see 2.3.3 above).</p> <p>2.5.2 The site Self-Assessment, the “Vic Farming Sustainability Report Aug 2015”, contains a list of the major outsourced services that consume water, including withdrawals from the Melbourne Water supply system. Water effluent from the site is measured by South East Water at the point where it enters the wastewater treatment system. Chickens from Broiler Farms contains the greatest amount of embedded water but produce little or no effluent as most water is used for drinking or embedded in feed stock. Effluent for other outsourced areas, for example Hatcheries, is measured by South East Water wastewater officers. Ingham’s receive this data but should incorporate this into their water stewardship plan.</p> <p>Observation 03 Effluent for outsourced areas, for example Hatcheries, is measured by South East Water wastewater officers. Ingham’s get this data but should incorporate this into their water stewardship plans and review.</p>

<p><b>2.6 Understand shared water-related challenges in the catchment</b></p> <p>Based upon the status of the catchment and stakeholder input, identify and prioritize the shared water-related challenges that affect the site and that affect the social, environmental and/or economic status of the catchment(s). In considering the challenges, the drivers of future trends and how these issues are currently being addressed by public-sector agencies must all be noted.</p>	<p><b>2.6.1 Prioritized and justified list of shared water challenges that also considers drivers and notes related to public-sector agency efforts</b></p>	<p><b>2.6.1</b> The document “Somerville PPP Water Stewardship Shared Water Challenges 2015” contains a list that meets the requirements.</p>
<p><b>2.7 Understand and prioritize the site's water risks and opportunities</b></p> <p>Based upon the status of the site, existing risk management plans and/or the issues identified in 2.6, assess and prioritize the water risks and opportunities affecting the site.</p>	<p><b>2.7.1</b> Prioritized list of water risks facing the site, noting severity of impact and likelihood within a given time frame</p> <p><b>2.7.2</b> Prioritized list of water-related opportunities for the site</p> <p><b>2.7.3</b> Estimate of potential savings/value creation</p>	<p><b>2.7.1</b> The document “Somerville PPP Water Stewardship Risks 2015” contains a list of water risks that meets the requirements.</p> <p><b>2.7.2</b> The document “Somerville PPP Water Stewardship Opportunities 2015” contains a prioritised list of water-related opportunities for the site.</p> <p><b>2.7.3</b> The site Self-Assessment contains a summary of savings and value creation that identifies the Advanced Water Treatment Plant at the site as cost neutral. It also identifies that the Plant reduces the requirement for South East Water to upgrade capacity at its Mt Martha sewerage treatment plant due to reduced Trade Waste water flows from recycling water at the site.</p>

**Advanced criteria**

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

Advanced Criteria	Indicators	Response Area
<p><b>2.8 Support and undertake joint water-related data collection:</b></p> <p>Engage in data gathering with two or more other organizations in the catchment or join a public-sector-led effort to gather the information required in Criterion 2.3.</p>	<p><b>2.8.1</b> Evidence of water-related data that was jointly gathered</p>	<p><b>2.8.1</b> The site is involved in a joint effort with the Western Port Catchment Project which is collecting existing primary data and information for the catchment and presenting it in a consolidated format. There is an intent for the project to gather new data. The site has also joined in the Catchment Management Authority catchment action roundtable workshops to gather project-related information to help in working towards the Catchment Management Authority catchment goals. The requirement is met as per the Guidance.</p>
<p><b>2.9 Gather additional, detailed water-related data:</b></p> <p>Gather additional data that goes beyond the core requirements with respect to the site or the catchment, or generate core data in highly data deficient environments, to further refine the site's understanding of its water stewardship context.</p>	<p><b>2.9.1</b> Water-related data sets that go beyond core requirements – See Guidance for details</p>	<p><b>Not assessed</b></p>
		<p><b>Not assessed</b></p>

<p><b>2.10 Review a formal study on future water resources scenarios:</b></p> <p>Gather detailed information that explores water usability (quantity and quality) under future scenarios (including extreme events, population and urbanization changes, economic development, possible climate change impact scenarios, and anticipated infrastructure needs) within the catchment and comment on the scenarios' impacts upon the site's growth strategy.</p>	<p><b>2.10.1 Copy of a study that details projected future state conditions relative to current quantity and quality parameters and a comment on potential impacts upon the site's growth strategy</b></p>	
<p><b>2.11 Conduct a detailed, indirect water use evaluation:</b></p> <p>Complete an advanced evaluation of indirect water use related to the site's primary products/services (including outsourced, downstream services) that identifies the location of water use within the site's supply chain and clarifies the site's ability to influence the management of its suppliers' water use.</p>	<p><b>2.11.1 Detailed description of the site's water-related supply chain with indirect water use amounts (for water quantity and quality) and the site's engagement efforts to date for each</b></p>	<p><b>2.11.1</b> The site has detailed water-related data on local water embedded use in the document "Vic Farming Consolidated Report Aug 2015" and a consolidated Life Cycle Assessment of other elements of the supply chain from Ingham's plants around Australia that has been published in the peer-reviewed literature. However, there is no document providing a consolidated site description or identifying the site's ability to influence the management of its supplier's water use. The site has sufficient data to meet the requirement but it needs to be consolidated to a detailed site description that clarifies influence and documents engagement to date.</p> <p><b>Observation 04</b> The site has sufficient data to meet this requirement, from life cycle assessments for example, but this needs to be consolidated for the site and also outline Ingham's ability to directly influence its supplier's water use and documentation demonstrating engagement to date.</p>
<p><b>2.12 Understand groundwater status or environmental flows and the site's potential contributions:</b></p> <p>Gather data on either groundwater status or environmental flows and identify the site's potential contribution. In all cases, coordination with relevant government agencies is required.</p>	<p><b>2.12.1 Conclusions about the site's potential contributions to groundwater recharge or environmental flows restoration</b></p>	<p><b>Not assessed</b></p>
<p><b>2.13 Complete a voluntary Social Impact Assessment:</b></p> <p>Complete a voluntary Social Impact Assessment for the site, with a particular focus on water.</p>	<p><b>2.13.1 Social impact assessment report</b></p>	<p><b>Not assessed</b></p>

### **Step 3 – PLAN**

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

## Core criteria

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

Core Criteria	Indicators	Response Area
<p><b>3.1 Develop a system that promotes and evaluates water-related legal compliance:</b></p> <p>Develop, or refer to, a system that promotes and periodically evaluates compliance with the legal and regulatory requirements identified in Criterion 2.3.</p>	<p><b>3.1.1 Documented description of system, including the processes to evaluate compliance and the names of those responsible and accountable for legal compliance</b></p>	<p>•Detailed in EMP – Legal obligations (EMP reviewed on annual basis).</p> <p>S3 Pg 36 EMS 5.1 Monitoring, 5.2 Auditing, 5.3 Annual Review, 4.7 Pg 46 non-compliance and corrective actions.</p> <p>Legal list Pg 40 table 4-1.</p> <p>Last year’s compliance is included in the EMP as key achievements.</p> <p><i>Observation 05</i> The key issues achievement chart shows figures e.g. for waste water but this is not related to legal compliance</p>
<p><b>3.2 Create a site water stewardship strategy and plan:</b></p> <p>Develop an internally available water stewardship strategy and plan for the site that addresses its shared water challenges, risks and opportunities identified in Step 2 and that contains the following components (see Guidance for plan template):</p> <p>A strategy that considers the shared water challenges within the catchment, water risks for the site (noting in particular where these are connected to existing public-sector agency catchment goals) and the site’s general response (from Criteria 2.6 and 2.7)</p> <p>A plan that contains:</p> <ul style="list-style-type: none"> <li>• A list of targets (based upon Criterion 2.7) to be achieved, including how these will be measured and monitored. Note: where identified as a shared water challenge, these targets must be continually improving for the four water stewardship outcomes until such time as best practice is achieved;</li> <li>• A list of annual actions that links to the list of targets;</li> <li>• A budget for the proposed actions with cost/benefit financial information (based, in part, upon financial data from 2.7);</li> <li>• An associated list indicating who will undertake the actions (i.e., who is responsible for carrying out the work) and who will ensure that the work is completed (i.e., who is accountable for achieving the</li> </ul>	<p><b>3.2.1 Available water stewardship strategy</b></p> <p><b>3.2.2 Available plan that meets all component requirements and addresses site risks, opportunities and stakeholder shared water challenges</b></p>	<p>3.2.1 Ingham’s has a strategy document “Ingham’s environmental policy and Waster Stewardship strategy.” This includes a list of shared challenges</p> <p><i>Observation 06</i> Ingham’s water stewardship strategy needs to include references to associated challenges in 2.6 and opportunities and shared challenges in 2.7</p> <p>3.2.2 A tabulated plan exists per the guidance but this includes reference to risks only.</p> <p>The origin of the shared risks is not clear, for example the Western port regional catchment strategy deals with biodiversity whereas the Southeast Water corporate plan gives Water intensity targets.</p> <p><i>NCR 06 major</i> The water stewardship plan does not address are required to criteria. In the following areas:</p> <ul style="list-style-type: none"> <li>• It lists risks only, it does not list opportunities or value creation</li> <li>• There is no link to monitoring</li> <li>• Is not clear where the objectives came from (this relates to criterion 3.4 contribution to catchment planning)</li> <li>• There is a need to reference improved governance targets in order to meet advance criterion 4.1.2.</li> </ul>

<p>target), including actions of other actors in the catchment;</p> <ul style="list-style-type: none"> <li>A brief explanation that speaks to how the proposed actions will affect: (A) water-risk mitigation, (B) water stewardship outcomes and (C) shared water challenges.</li> </ul>		
<p><b>3.3 Demonstrate responsiveness and resilience to water-related risks into the site's incident response plan:</b></p> <p>Add to or modify the site's incident response plan to be both responsive and resilient to the water-related risks facing the site.</p>	<p><b>3.3.1 A description of the site's efforts to be responsive and resilient to water-related issues and/or risks in an appropriate plan</b></p>	<p>The Site AWTP has a HACCP manual for operation that includes Emergency Response Protocols in Section 17.</p> <p>There are several examples of responsiveness and resilience:</p> <ul style="list-style-type: none"> <li>If advanced water does not meet specification reversion to 100% town water is required.</li> <li>The trade waste pump station has an overflow that diverts to a holding Dam in the event that South East water cannot take effluent.</li> <li>There is a triple interceptor to catch run off and there are daily inspections.</li> </ul>
<p><b>3.4 Notify the relevant (catchment) authority of the site's water stewardship plans:</b></p> <p>Contact the appropriate catchment authority/agency (if any) and inform them of the site's plans to contribute to the water stewardship objectives of their catchment plan as identified in Criterion 2.3.</p>	<p><b>3.4.1 Documented evidence of communicating the site's plan to the relevant catchment authority/agency</b></p>	<p>The Somerville WS Plan has not been communicated formally to the Port Phillip and Westernport Catchment Management Authority. However, the PP&amp;WPCMA are part of the WPB Watson Creek Water Stewardship Project and so are aware that Inghams have a WS Plan. There are minutes available for the WPB Water Stewardship Project Reference Group meetings showing the CMA are in attendance.</p> <p>There are links to shared challenges across several agencies.</p> <p><i>Observation 07</i> The shared challenges link to catchment plan but it is unclear which plans are referred to. For example Port Phillip and Westernport regional catchment strategy deals with biodiversity whereas the Southeast water corporate plan gives water intensity targets.</p>

### Advanced criteria

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

Advanced Criteria	Indicators	Response Area
<p><b>3.5 Gain stakeholder consensus on the site's water stewardship targets:</b></p> <p>Achieve a consensus amongst stakeholders around at least one of</p>	<p><b>3.5.1 A list that indicates which targets achieved consensus along with a list of stakeholders involved</b></p>	<p>List provided of targets achieved and consensus along with a list of stakeholders includes</p> <p>WPB Watson Creek Water Stewardship Project Reference group Stakeholders include:</p>

<p>the site's targets to address shared water challenges.</p>		<ul style="list-style-type: none"> <li>o Westernport Biosphere Foundation</li> <li>o Port Phillip and Westernport Catchment Management Authority</li> <li>o Mornington Peninsula Shire Council</li> <li>o Melbourne Water</li> <li>o South East Water</li> <li>o Water Stewardship Australia</li> <li>o Inghams</li> </ul> <p>Stakeholders invited but who have had limited engagement in the project so far include:</p> <ul style="list-style-type: none"> <li>o Victoria EPA</li> <li>o Parks Victoria</li> <li>o Southern Rural Water</li> </ul> <p>Watson Creek Catchment Group membership. Consensus in targeting improved outcomes for Watson Creek streamside environmental issues.</p>
<p><b>3.6 Develop a formal plan for climate change adaptation:</b></p> <p>In coordination with relevant public sector agencies and infrastructure management entities, develop a plan with detailed and explicit water-related adaptation strategies to mitigate risks of projected climate change impacts, including for shared water infrastructure.</p>	<p><b>3.6.1 A set of plans that speak to the site's risk mitigation with respect to projected climate change impacts including for shared water infrastructure</b></p>	<p>Not assessed</p>

## **Step 4 – IMPLEMENT**

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

### **Core criteria**

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

Core Criteria	Indicators	Response Area
<p><b>4.1 Comply with water-related legal and regulatory requirements and respect water rights:</b></p> <p>Meet all applicable legal and regulatory requirements related to water balance, water management and Important Water-Related Areas as well as water-related rights. As noted in Criteria 1.1 and 3.2, where, through its water use, the site is contributing to an inability to meet the human right to safe drinking water and sanitation, the site must also continually work with relevant public sector agencies until this basic human right to water and sanitation is fulfilled.</p>	<p><b>4.1.1 Documentation demonstrating compliance</b></p> <p><b>4.1.2 (Catchments with stakeholders who have an unmet human right to safe drinking water and sanitation) Documentation of efforts to work with relevant public sector agencies to fulfil human right to safe drinking water and sanitation.</b></p>	<p><b>4.1.1 Detailed in EMP and demonstrated via Trade Waste Agreement compliance.</b></p> <p>No non-compliance to this agreement apart from one e mail indicting out of specification trade waste.</p> <p><b>4.1.2 The catchment use is beyond the point where it influences drinking water so there is no unmet need for safe drinking water.</b></p> <p>Review of compliance at sustainability team meetings where compliance is an agenda item and any violations or incidents are recorded.</p> <p>Minutes of meeting 14<sup>th</sup> Dec 2014 sighted and no issues noted.</p>

		<p>Review with relevant water authorities noted</p> <ul style="list-style-type: none"> <li>• Westernport Biosphere Watson Creek WS Project meeting minutes demonstrate efforts to work with public sector agencies such as; <ul style="list-style-type: none"> <li>o PP&amp;WP CMA</li> <li>o Melbourne Water</li> <li>o Mornington Shire Council</li> <li>o South East Water</li> </ul> </li> </ul>
<p><b>4.2 Maintain or improve site water balance:</b></p> <p>Meet the site's water balance targets. As noted in Criterion 3.2., where water scarcity is a shared water challenge, the site must also continually decrease its water withdrawals until best practices are met and work with relevant public sector agencies to address the imbalance and shared water challenge. Note: if a site wishes to increase its water use in a water scarce context, the site must cause no overall increase in water scarcity in the catchment and depletion of the site's water source(s) and encourage relevant public sector agencies to address the unlawful water use contributing to the imbalance in the catchment.</p>	<p><b>4.2.1 Measurement-based evidence showing that targets have been met 4.2.2 (Water scarce catchments only) Evidence of continual decrease or best practice 4.2.3 (Sites wishing to increase withdrawals in water scarce catchments only) Evidence of no net increase in water scarcity</b></p>	<p><b>4.2.1 Evidence that targets met:</b></p> <ul style="list-style-type: none"> <li>• AWTP summary data for 2012-2015 shows flow totals for site including proportion advanced water.</li> <li>• EMP water management target for 2014-15 to exceed 70% recovery was met over 3 years (2013/13 68.4%, 2013/14 69.5%, 2014/15 72.9%).</li> <li>• EMP surface water management target for 2014-15 to exceed 6ML recovery was met.</li> <li>• EMP wastewater management target for 2014-15 trade waste to not exceed 30% of total water usage was met.</li> </ul> <p>Best practice is demonstrated by the AWTP</p> <p><b>4.2.2</b> The catchment can be 'water scarce' and the Melbourne Desalination plant has been built as a contingency. However, this plant has received a zero production order for the period to June 2016 indicating acceptable water balance</p> <p><b>4.2.3</b> The site is not seeking to increase withdrawals because of the AWTP.</p> <p>The catchment expert at the audits advised</p> <p><i>Potable and process water come from the greater Melbourne reticulated system run by Melbourne Water. Water for this system predominantly derives from the upper Yarra and Thomson River catchments and the Cardinia Creek catchment. In addition, a desalination plant and a pipeline from the Goulburn River to the north may add to these sources in the future, particularly in a drying climate. The impact on the Melbourne reticulated water resource is miniscule. Ingham's Somerville processing plant is with the Watsons Creek catchment, however, no water is extracted from Watsons Creek and only managed stormwater is returned. There should,</i></p>

		<i>therefore, be no impact on Watsons Creek from the processing plant.</i>
<p><b>4.3 Maintain or improve site water quality:</b></p> <p>Meet the site's water quality targets. As noted in Criterion 3.2., where water quality stress is a shared water challenge, the site must also continually improve its effluent for the parameters of concern until best practices are met and work with relevant public sector agencies to address the imbalance and shared water challenge. Note: if a site wishes to increase its water use in a water stressed context, the site must cause no overall increase in the degradation of water quality in the catchment and degradation of the site's water source(s) and encourage relevant public sector agencies to address the unlawful water use contributing to the degradation in the catchment.</p>	<p>4.3.1 Measurement-based evidence showing that targets have been met</p> <p>4.3.2 (Water quality-stressed catchments only) Evidence of continual improvement or best practice</p> <p>4.3.3 (Sites wishing to increase effluent levels of water quality parameters of concern in water quality-stressed catchments only) Evidence of no net degradation in water quality in the catchment</p>	<p>4.3.1 Sampling done per the trade waste agreement (3 days of samples taken on consecutive days per month)</p> <p>AWTP data records for water sampling of trade waste indicate that TW consent conditions have largely been met.</p> <p>4.3.2 The AWTP represents best practice in effluent management. Letter from SE Water to Julia Seddon noted best practice at the Ingham's site is recognised by the water authority.</p> <p>4.3.3 Ingham's do not wish to increase effluent levels.</p>
<p><b>4.4 Maintain or improve the status of the site's Important Water-Related Areas:</b></p> <p>Meet the site's targets for Important Water-Related Areas at the site. As noted in Criterion 3.2., where Important Water-Related Area degradation is a shared water challenge, the site must also continually improve its Important Water-Related efforts until best practices are met, and the site must not knowingly cause any further degradation of such areas on site.</p>	<p>4.4.1 Documented evidence showing that targets have been met</p> <p>4.4.2 (Degraded Important Water-Related Area catchments only) Evidence of continual improvement or best practice</p>	<p>4.4.1 MPSC WSRL projects.</p> <ul style="list-style-type: none"> <li>o Completion of WSRL Riparian planting project reported in EMP 2014-15 achievements and formally signed off in the table of achievements.</li> <li>o Photographic evidence sighted of changed and improved landscape.</li> <li>o Aerial map of water important areas on Somerville site sighted.</li> </ul> <p>Sighted letter to MPSC Landcare network indicating re-vegetation work has been completed.</p> <p>4.4.2 There are plans for more vegetation work to increase a biodiversity corridor.</p>
<p><b>4.5 Participate positively in catchment governance:</b></p> <p>Continually coordinate and cooperate with any relevant catchment management authorities' efforts. As noted in Criterion 3.2, where water governance is a shared water challenge, the site must also continually improve its efforts until best practices are met.</p>	<p>4.5.1 Documented evidence of the site's ongoing efforts to contribute to good catchment governance</p> <p>4.5.2 (Weak water governance catchments only) Evidence of continual improvement or best practice</p>	<p>4.5.1 Documents show involvement as key partner in development of WPB/WS stakeholder workshops and consequent Watson Creek WS Project initiative. Including Project report, Minutes of meetings, table of participants and WSA Reference panel update 25/5/2015.</p> <p>4.5.2 This is not an area of weak water Governance.</p>
<p><b>4.6 Maintain or improve indirect water use within the catchment:</b></p> <p>Contact the site's primary product suppliers and water-related service providers located in the catchment and request that they take actions to help contribute to the desired water stewardship outcomes.</p>	<p>4.6.1 List of suppliers and service providers, along with the actions they have taken as a result of the site's engagement relating to indirect water use</p>	<p>Engagement is evident.</p> <p>Part of the broad WPB/WS stakeholder workshop – especially Melbourne Water and SE Water engagement</p> <ul style="list-style-type: none"> <li>• Engagement with farming division to bring Ingham growers on board.</li> </ul> <p>Discussions with some other suppliers e.g. Visy.</p> <p>However, there is no real list.</p>

		<p><b>NCR 07 minor</b>  <i>The standard requires a list of suppliers and service providers are maintained and actions as a result of the engagement. Ingham's has not provided such a list.</i></p>
<p><b>4.7 Provide access to safe drinking water, adequate sanitation and hygiene awareness (WASH) for workers on-site:</b></p> <p>Ensure appropriate access to safe water, effective sanitation and protective hygiene for all workers in all premises under the site's control.</p>	<p><b>4.7.1 List of actions taken to provide workers access to safe water, effective sanitation and protective hygiene (WASH) on-site</b></p>	<p>A self-assessment exercise shows:</p> <ul style="list-style-type: none"> <li>• Amenities water is provided using the SE Water potable water supply. <ul style="list-style-type: none"> <li>o There is a separate pumping and distribution system. A 1ML tank is held on site so that in event of supply failure there will be a period of usage available until supply can be re-established</li> <li>o Staff have regular training, tool-box talks and other activity emphasising hygiene especially as it relates to food safety but also to their own personal protection from infection</li> </ul> </li> </ul>
<p><b>4.8 Notify the owners of shared water-related infrastructure of any concerns:</b></p> <p>Contact the owners of shared water-related infrastructure and actively highlight any concerns the site may have in light of its risks and shared water challenges.</p>	<p><b>4.8.1 List of individuals contacted and key messages relayed</b></p>	<p>The Somerville Poultry Processing plant stakeholder list 2015 shows contacts as follows:</p> <ul style="list-style-type: none"> <li>• South East Water – (Trade Waste officer) <ul style="list-style-type: none"> <li>o regular dialogue with respect to trade waste performance and actions arising</li> </ul> </li> <li>• Watson Creek Catchment Group – Landcare Group &amp; Mornington Landcare network. <ul style="list-style-type: none"> <li>o President</li> <li>o Meetings and activities to communicate our commitment to the improvement and protection of the Watson Creek catchment.</li> </ul> </li> <li>• WP Biosphere group – similar to above. <ul style="list-style-type: none"> <li>o Chairperson</li> <li>o Watson Creek WS Project officer</li> </ul> </li> <li>• Mornington peninsula Shire <ul style="list-style-type: none"> <li>o Engaged in WSRL program.</li> <li>o CMA.</li> </ul> </li> </ul>

**Advanced criteria**

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

Advanced Criteria	Indicators	Response Area
<p><b>4.9 Achieve best practice results on site water balance:</b></p> <p>Achieve best practice results with respect to the site's water balance targets as informed by stakeholder consensus or industry specific benchmarks.</p>	<p><b>4.9.1 Quantified improvement in water balance from site-set baseline date</b></p> <p><b>4.9.2 Evidence showing that actions meet best practice expectations</b></p>	<p><b>4.9.1</b> The AWTP is unique and there is no world benchmark for its operation but <i>currently</i> in excess of 70% of advanced water is used in the process.</p> <p>Figures show significant reduction in water purchased from SE Water compared to pre AWTP commissioning.</p>

		<p>Advanced water metrics – significant water purchase reduction since commissioning.</p> <p>Data over 3 years of operation showing water recycling targets met and improving.</p> <p>4.9.2 A letter from SE Water Indicates stakeholder recognition of best practice in site water balance.</p>
<p><b>4.10 Achieve best practice results on site water quality:</b></p> <p>Achieve best practice results with respect to the site's water quality targets as informed by stakeholder consensus or industry-specific benchmarks.</p>	<p><b>4.10.1 Quantified improvement in water quality from site-set baseline date</b></p> <p><b>4.10.2 Evidence showing that actions meet best practice expectations</b></p>	<p>4.10.1 Again the AWTP impacts on water quality improvement and represents best practice. Because the plant is unique the only expected base line is in the plant design report.</p> <p>Figures show that trade waste agreement and consent targets are being exceeded.</p> <p>4.10.2 A letter from SE Water Indicates stakeholder recognition of best practice in site water quality.</p> <p>Water quality improvements are demonstrated at Watson Creek tributary from WSRL projects.</p> <p><i>Observation 08.</i>  <i>Things have been done to address this requirements including actions for improved water quality since baseline data. The plant design report sets this baseline but this was not available at the time of audit. There's also a need for data showing improvement against the baseline .</i></p>
<p><b>4.11 Achieve best practice results on Important Water-Related Areas through restoration:</b></p> <p>Achieve best practice results with respect to the site's Important Water-Related targets and complete restoration of non-functioning or severely degraded Important Water-Related Areas as informed by stakeholder consensus or credible expert opinion.</p>	<p><b>4.11.1 Evidence of completed restoration of non-functioning or severely degraded Important Water Related Areas</b></p> <p><b>4.11.2 Evidence showing that actions meet best practice expectations</b></p>	<p>4.11.1 The water catchment expert at the audit confirmed that the baseline situation was that the Watson Creek was biologically dead due to raw effluent discharge.</p> <p>The WRSL project is now complete.</p> <p>4.11.2 Evidence of completion and stakeholder acknowledgement includes:</p> <p>Ingham's closing project summary dated 14 Nov 2014.  <a href="#">You tube video</a> 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)</p> <p>Minutes of catchment group meetings  Mornington shire letter dated 21 Nov 2013 with grant approval and recognition.</p> <p>The catchment expert advised</p> <p><b>4.11 - Health of Watsons Creek:</b></p>

		<p><i>Water quality and the biological condition of Watsons Creek have long been seen as very poor. In the 1980s there were major impacts from effluent discharges (EPA 1988). An extensive assessment of rivers and streams in the Western Port catchment undertaken by EPA in the mid 1990s (EPA 1998) found Watsons Creek to very poor ecological condition, indeed, out of 34 it was rated as one of the poorest five. Similar findings were found in the late 1990s in a report to Melbourne Water (AWT 1998). A more recent study (2008) again found that water quality and biological health were compromised (Elgin 2008). All of these studies suggest that the poor ecological health to primarily due to nutrients, and to a lesser extent, sediment entering the creek and resulting in excessive plant growth and low dissolved oxygen levels. The sources of nutrients and sediment are usually attributed to bed and bank in stability and increasing urbanisation.</i></p> <p><i>References:</i>  <i>Elgin (2008). Watsons Creek water quality monitoring. Report prepared by Elgin for the Mornington Peninsula and Western Port Biosphere Reserve Foundation.</i>  <i>EPA (1988). The impact of poultry abattoir waste on Watsons Creek, Mornington Peninsula. EPA Publication no. SRS 88/011.</i>  <i>EPA (1998). Environmental health of streams in the Western Port catchment. EPA publication no. 600.</i>  <i>AWT (1998). Waterway assessment in the western port catchment - The environmental health of western port peninsula streams. AWT report no. 267/98</i></p>
<p><b>4.12 Achieve best practice results and strengthen capacity in water governance:</b></p> <p>Achieve best practice results with respect to the site's water governance targets, including transparently strengthening governance capacity, as informed by stakeholder consensus and public-sector leadership recognition.</p>	<p><b>4.12.1</b> List of efforts to positively engage and strengthen water governance capacity from a site-set baseline date</p> <p><b>4.12.2</b> Evidence showing that actions meet best practice expectations</p>	<p>4.12.1 There are examples of efforts to engage but there is no list</p> <p>4.12.2 There is evidence of stakeholder approval including a letter from the Western Port Biosphere Foundation (Chairman to Inghams Julia Seddon) recognising Inghams efforts.</p> <p><i>Observation 09</i>  <i>There are no improved water governance targets in the plan (See also NCR 06)</i></p>
<p><b>4.13 Advance regionally specific industrial water-related benchmarking:</b></p> <p>Contribute to or participate in the development of regionally specific industrial water-related benchmarking and spreading best practices.</p>	<p><b>4.13.1</b> List of efforts to contribute to regionally specific benchmarking and spread best practices</p>	<p>Not assessed</p>
<p><b>4.14 Re-allocate saved water for social or environmental needs:</b></p>	<p><b>4.14.1</b> Total volume of water officially re-allocated for social and</p>	<p>Not assessed</p>

<p>Ensure that any water saved by the site's actions under 4.2 is voluntarily re-allocated for social or environmental purposes that are recognized needs in the catchment.</p>	<p>environmental needs (in m3 or Mm3)</p> <p>4.14.2 Documentation of legal contracts for the reallocation of water to social or environmental needs</p>	
<p>4.15 Engage in collective action to address shared water challenges:</p> <p>Work with other interested entities in the catchment to advance or improve water stewardship outcomes. For the additional recognition (6 points), quantifiably improve the shared water challenge and be recognized by stakeholders as having played a material role in the improvement.</p>	<p>4.15.1 List of collective action efforts, including a description of the role played by the site</p> <p>4.15.2 Quantified improvement in outcome(s) or shared water challenge(s) from site-set baseline date</p> <p>4.15.3 (For extra points only) Stakeholder-based evidence recognizing that the site played a material role in the improvement</p>	<p>4.15.1 • WPB Watson Creek project underway (year one of three-year plan)</p> <ul style="list-style-type: none"> <li>• Actions combined with Landcare group WCCG</li> <li>• Recognition of leadership by Inghams from WPB project reference group panel. (6 signatories)</li> </ul> <p>Stakeholders including Somerville secondary college shown as an example of a stakeholder in the Inghams poultry processing plant stakeholder list.</p> <p>4.15.2 Improvements shown in:</p> <p>Inghams closing project summary dated 14 Nov 2014.  <a href="#">You tube video</a> 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)</p> <p>4.15.3 Insufficient Stakeholder-based evidence recognizing that the site played a material role in the improvement 8 points only</p>
<p>4.16 Drive reduced indirect water use throughout the site's supply chain and outsourced water-related service providers:</p> <p>Contact the site's primary product suppliers and water-related service providers located outside the site's catchment and request they take actions to help contribute to the desired water stewardship outcomes in their catchments. For the additional recognition (2 points), quantify the improvements that the site's intervention generated and be recognized by the site's supplier as having played a material role in prompting that improvement.</p>	<p>4.16.1 List of suppliers with details on engagement efforts</p> <p>4.16.2 Quantified improvement by the supplier as a result of this engagement</p> <p>4.16.3 (For extra points only) Supplier-based evidence recognizing that the site played a material role in prompting the change</p>	<p>Not assessed</p>
<p>4.17 Complete implementation of water-related initiatives:</p> <p>Complete implementation of one or more of the initiatives committed to in 1.4.</p>	<p>4.17.1 Appropriate documentation or evidence of completion of initiative</p>	<p>AWTP operational</p> <p>Signed 2001 agreement Watson Creek agreement June 2007 on <a href="http://www.biosphere.com">www.biosphere.com</a> project completed.</p>
<p>4.18 Provide access to safe drinking water, adequate sanitation and hygiene awareness offsite:</p> <p>In coordination with relevant public authorities, directly assist in the provision of appropriate access to safe drinking water, adequate</p>	<p>4.18.1 List of actions taken to provide catchment stakeholders with access to off-site access to safe drinking water, adequate sanitation and hygiene awareness.</p>	<p>Not assessed</p>

sanitation and hygiene awareness for individuals off-site within the catchment.		
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## Step 5 – EVALUATE

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

### Core criteria

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

Core Criteria	Indicators	Response Area
<p>5.1 Evaluate the site’s water stewardship performance, risks and benefits in the catchment context:</p> <p>Periodically review the site’s performance in light of its actions and targets from its water stewardship plan to evaluate:</p> <ul style="list-style-type: none"> <li>General performance in terms of the water stewardship outcomes (considering context and water risks), positive contributions to the catchment, and water-related costs and benefits to the site.</li> </ul>	<p>5.1.1 Post-implementation data and narrative discussion of performance and context (including water risk)</p> <p>5.1.2 Total amount of water-related costs, cost savings and value creation for the site based upon the actions outlined in 3.2 (drawn from data gathered in 2.4.6)</p> <p>5.1.3 Updated data for indicator 2.4.7 on catchment shared value creation based upon the actions outlined in 3.2</p>	<p>5.1.1, 5.1.2, 5.1.3</p> <p>The site managers indicated that actions and targets from the 2014 Water Stewardship Plan (draft WSS) have been reviewed and used to produce the 2015 Plan for audit. However, there is no narrative of performance of the 2014 plan. The 2015 plan outlines the process for review of targets and actions that will be used to produce the 2016 Plan, and this process is included in the Environmental Management Plan. However, the review process does not address all the requirements identified in the Guidance (p151) for a description of the review process, data from the review and identification of resultant changes from the 2014 plan. The Indicators have not been met as this is the first audit against the current standard.</p> <p>NCR 08 major The 2014 plan which was developed against the Beta standard was reviewed to create the 2015 plan. Review of the 2015 plan is planned but not yet done since this is the first water stewardship audit. This review requires.</p> <ul style="list-style-type: none"> <li>The description the process for review (following the guidance).</li> <li>Data from the review</li> <li>Changes from 2014 plan as a result of the review</li> </ul> <p>NOTE: The Standard may need amendment or clarification to enable this requirement to be met on the first audit of a site. This non-conformance affects other Criteria under this Principle.</p>

<p><b>5.2 Evaluate water-related emergency incidents and extreme events:</b></p> <p>Evaluate impacts of water-related emergency incidents (including extreme events), if any occurred, and determine effectiveness of corrective and preventive measures. Factor lessons learned into updated plan.</p>	<p><b>5.2.1 Documented evidence (e.g., annual review and proposed measures)</b></p>	<p><b>5.2.1 No water-related emergency incidents have occurred since the plant was commissioned in 2012. One incident was reported to the Environment Protection Authority in 2012 but as no action was required. The process of review of water-related incidents is not described.</b></p> <p><b>Observation 10</b> No water related incidents have occurred but there is a need to describe the process of review of water related incidents. This also forms part of the process required under NCR 08.</p>
<p><b>5.3 Consult stakeholders on water-related performance:</b></p> <p>Request input from the site's stakeholders on the site's water stewardship performance and factor the feedback/lessons learned into the updated plan.</p>	<p><b>5.3.1 Commentary by the identified stakeholders</b></p>	<p><b>5.3.1 The Environmental Management plan provides targets for stakeholder engagement (e.g. Vegetation Action Plan p13) and a list of achievements with stakeholders to date (p19). Other documents provide commentary on site performance from stakeholders, e.g. the document "Inghams WS Letter from WS Biosphere 1Oct2015". However, there is no formal process in place or evidence of how feedback or lessons are used to update the plan.</b></p> <p><b>Observation 11</b> Stakeholder engagement is ongoing but there is no formal processes in place and there is no evidence of how feedback or lessons learned are used to update the plan</p>
<p><b>5.4 Update water stewardship and incident response plans:</b></p> <p>Incorporate the information obtained into the next iteration of the site's water stewardship plan. Note: updating does not apply for initial round of Standard implementation.</p>	<p><b>5.4.1 Modifications to water stewardship and incident response plans incorporating relevant information</b></p>	<p><b>5.4.1 Not applicable, as this is the first audit of the site.</b></p>

## Advanced criteria

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

Advanced Criteria	Indicators	Response Area
<p>5.5 Conduct an executive or governance body-level review of water stewardship efforts:</p> <p>Review the site's water stewardship performance, impacts and risks with either the organization's executive team (CEO/CFO or equivalent) or board (or equivalent).</p>	<p>5.5.1 Agenda and minutes of executive team or governance body meeting noting water stewardship discussion</p>	<p>5.5.1 The Inghams Board has considered Water Stewardship and included it as one of four elements in the Business Sustainability Group. The Board has not considered the outcome of a formal review as this has not yet occurred. Minutes of the Extended Leadership Team meeting of 21-23 September 2015 demonstrate that water stewardship was discussed.</p> <p><i>Observation 12</i> Water stewardship system has been considered at the Board and CEO level. They did not consider the outcomes and review since review has not yet occurred.</p>
<p>5.6 Conduct a formal stakeholder evaluation:</p> <p>Undertake a formal review with the site's stakeholders on the site's efforts to address shared water challenges. This includes reviewing the site's contributions to maintaining good governance, adequate flows for all needs, good water quality status and functioning Important Water-Related Areas, and soliciting suggestions for continuous improvement.</p>	<p>5.6.1 Documentation of formal stakeholder evaluation with recommendations for updated Criterion 3.5</p>	<p><b>Not assessed</b></p>

## Step 6 – COMMUNICATE & DISCLOSE

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

### Core criteria

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

Core Criteria	Indicators	Response Area
<p>6.1 Disclose water-related internal governance:</p> <p>Publicly disclose the general governance structure of the site's management, including the names of those accountable for legal compliance with water-related laws and regulations.</p>	<p>6.1.1 Disclosed and publicly available summary of governance at the site, including those accountable for compliance with water-related laws and regulations</p>	<p>6.1.1 The company has not disclosed the names of those accountable for water-related laws and regulations, other than for the standard legal responsibility to identify responsible senior managers, as this would potentially breach rights under the Commonwealth Privacy Act 1988 and potentially impact on the company insurances. The Environmental Management Plan identifies the roles and responsibilities within the company structure (Tables 4.1, 4.2) and the individuals</p>

		<p>responsible (Table 4.3). To meet the requirement the company needs to publically disclose a summary of the water governance (e.g. committees and position titles) of the, including the names of senior management with ultimate legal responsibility.</p> <p><b>NCR 09 minor</b> The site needed to disclose and make publicly available a summary of governance at the site. It was noted that insurance and privacy provisions mean it is not possible the use of names below the CEO and ex-chairman level which are currently in the disclosure.</p>
<p><b>6.2 Disclose annual site water stewardship performance:</b></p> <p>Disclose the relevant information about the site's annual water stewardship performance, including results against the site's targets.</p>	<p><b>6.2.1 Disclosed summary of site's water stewardship results</b></p>	<p><b>6.2.1</b> There has been some disclosure of information on Water Stewardship results for specific actions (e.g. media reports) but these have not been disclosed as a summary and assessment against the site's targets as this is the first audit of the site's Water Stewardship.</p> <p><b>Observation 13</b> There are disclosures of water stewardship results but they don't formally relate to the site's performance against the targets. There is a need to consolidate these into a summary. The data gathered for the disclosure will be part of formal review which is not yet occurred.</p> <p><b>NOTE:</b> This finding is related to that of Criterion 5.1.</p>
<p><b>6.3 Disclose efforts to address shared water challenges:</b></p> <p>Publicly disclose the site's shared water challenges and report on the site's efforts to help address these challenges, including all efforts to engage stakeholders and coordinate and support public-sector agencies.</p>	<p><b>6.3.1 Disclosed and publicly available description of shared challenges and summary of actions taken to engage stakeholders (including public-sector agencies)</b></p>	<p><b>6.3.1</b> Evidence of shared water challenges address cooperatively with stakeholders was provided, e.g. involvement in the Western Port Bay Biosphere project, participation in CMA roundtable and Peninsula Landcare Network. A newspaper report of Inghams involvement with other stakeholders was provided.</p>
<p><b>6.4 Drive transparency in water-related compliance:</b></p> <p>Make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences. Note: any site-based violation that can pose an immediate material threat to human or ecosystem health from use of or exposure to site-related water must be reported immediately to relevant public agencies.</p>	<p><b>6.4.1 Available list of water-related compliance violations with corresponding corrective actions</b></p>	<p><b>NCR 09 minor</b> The site needed to disclose and make publicly available summary of governance at the site. It was noted that insurance and privacy provisions mean it is not possible the use of names below the CEO and ex-chairman level which are currently in the disclosure.</p> <p><b>6.4.1</b> No water-related compliance violations have occurred at the site. Provisions for reporting compliance</p>

		<p>violations are contained within the procedures for Incident Reporting, Incidence Response and Incident Reporting Investigation (doc 4.03.01).</p> <p>NCR 10 minor The EMP does not adequately describe how compliance violations would be disclosed if required.</p>
<p><b>6.5 Increase awareness of water issues within the site:</b></p> <p>Strive to raise the understanding of the importance of water issues at the site through active communications.</p>	<p><b>6.5.1 Record of awareness efforts (dates and communication) and, if possible, level of awareness</b></p>	<p><b>6.5.1 Water Stewardship</b> information is posted on the sites Intranet. The site manager was reported to have sent this to plant section heads at the scheduled daily team meetings a number of times, including having provided notification of the audit. The Visual Management Board in the Production Office identified the audit. Water stewardship is included in the Environmental Management Plan, and activities on site (e.g. Landcare) have been notified to staff by email. There was a stated intent to create Key Performance Indicators around water stewardship.</p>

### Advanced criteria

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

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

**END OF REPORT**

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