

## ACO Leading Harvest Audit Report

*The purpose of this audit was verification of conformance with the requirements of the Leading Harvest Farmland Management Standard 2020, through a sampling process of the information available by examining operating procedures, materials relating to farmland management practices and on-the-ground field performance, and through meetings or correspondence with employees, contractors and other third parties (e.g. government agencies, community groups, affected Indigenous Peoples, conservation organisations), as appropriate.*

Audit Details	
<b>Trading Name</b>	Altora Ag
<b>Crop(s)</b> <i>(scope of certification)</i>	Broadacre (grains, pulses, and Canola)
<b>Leading Harvest Program User ID or Membership Number</b>	ACO Certification No. 13479
<b>Leading Harvest Contact Person</b> <i>(name and contact details)</i>	<ul style="list-style-type: none"> <li>• Maria Steel (Chief People Officer)</li> <li>• Scott Bartlett (Head Agronomist)</li> <li>• Amie Turner-Brown (Sustainability Advisor)</li> </ul>
<b>Total Number and Area of Farms Managed</b>	65 farms = 153,077 ha
<b>Sites Audited</b>	<b>WA:</b> Erregulla Planis, Bodallin <b>NSW:</b> Mayfair, Moore Park, Orana Park, Stewarts <b>QLD:</b> Moreville, Kinbeachie <b>VIC:</b> Catumnal
<b>Auditee Position/Title</b>	<b>WA:</b> General Manager, Farm Managers, Agronomist <b>NSW &amp; VIC:</b> Operations Manager, Merchandise Manager, Commercial Manager, Grain Services Manager, HR Manager, Operations Manager, Farm Managers <b>QLD:</b> Farm Managers, Agronomist
<b>Type and Scope of Audit</b>	Initial certification
<b>Auditor(s) and Any Accompanying People e.g. observers &amp; technical experts</b>	Sam Ponder

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<b>Audit Dates Onsite</b>	28/03/2023, 29/03/2023
<b>Audit Dates Offsite</b>	1/4/2023
<b>Audit Plan</b>	<p><b>Opening Meeting summary:</b></p> <ol style="list-style-type: none"> <li>1. Introductions</li> <li>2. Scope of the audit</li> <li>3. Estimated duration of the audit.</li> <li>4. Confidentiality</li> <li>5. Conflict of interest</li> <li>6. Audit outline</li> <li>7. Authorised personnel present.</li> <li>8. Changes that affect the management system since the last audit</li> <li>9. Effectiveness of corrective actions taken in relation to previous audit non-conformities, if applicable.</li> <li>10. Rationale for substituted or modified indicators, if applicable.</li> <li>11. Effective control of the use of certification marks, if applicable.</li> </ol> <p><b>Description of the audit process:</b>          The WA, QLD, NSW and VIC audits commenced with an introduction and discussion with farm managers, consultant agronomists and senior Altona Ag and NRA management followed by inspection of the equipment/facilities at the main office yard and with further inspection of the farms, their facilities and surrounding areas. The remainder of the time was spent reviewing/verifying documentation and management practices consistent with Leading Harvest Standards requirements.</p> <p><b>Closing Meeting summary:</b>          There were no non-conformances observed across the operational sites inspected – a number of observations were made for consideration.          Significant discussion took place on improvements that were in process of being implemented through CAPEX proposals.          Surveillance audits are scheduled for a selection of the farms early 2024.</p>

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## Executive Summary

### Overall site assessment:

Altora Ag began operations 1 February 2023. Comprising 65 farms currently with 153,000 arable hectares. WA sites audited are situated approximately 350 Kms to the North East and a similar distance to the East of Perth in marginal rainfall country. Soils comprise mostly sand of varying colour white, yellow and brown (containing higher vegetation content). QLD sites audited and visited are situated approximately 60 Kms to the West of Goondiwindi in 550mm rainfall country. The country lies along the Macintyre River system and is relatively flat, interspersed with timbered gilgai's and waterholes which are maintained in their natural state. Soils comprise mostly black self-mulching (89%) and chocolate to red loam (11%) soils. NSW and VIC sites audited situated in the proximity of Temora, NSW and Boort, VIC in 350-550mm rainfall country. The country is all dryland farming, though Cutumnal in VIC does include some flood irrigated land; it is relatively flat and interspersed with timbered areas maintained in their natural state with a predominately winter rainfall pattern. Soils comprise mostly chocolate to red loam running to lighter soils in VIC.

All crops are dry planted and rely on natural rainfall events for germination. Stubble retention and strip discing are core strategies used for moisture retention. Across the operations, various strategies are utilised to optimise water and nutrient retention including cover cropping, crop rotations, nitrogen fixing crops, deep ripping, mixing soil types, short and long fallows, double break cropping, and stubble retention. Crops grown are typically wheat, barely, Canola and lupins.

Seed from previous year's crops are stored on farm in a series of numbered silos, some seed however is purchased in each year from local suppliers where possible. Seed is delivered out to paddocks in bulk to re-fill seeders. Seed sowing rates are varied depending on seasonal requirements and to improve yields. Due also to seasonal variability seed varieties are available that meet early or late planting deadlines.

Discussion and in-field observations/inspections took place with farm managers and agronomists. Soil moisture is actively measured and monitored during field inspections. All spraying takes place by qualified individuals; ChemCert or equivalent accreditation is held by all relevant staff and contractors. NOTE that contractors operate under signed agreements and are inducted and engaged for all operational activities such as sowing, harvesting, spraying. In consultation with agronomists all work orders are structured so that all activities are recorded from start to finalisation of the work. Contractors have access through intranet systems to all SDS's. Farm Managers have actual real-time access to all of their activities and times started and finished utilizing cloud based management and recording systems which cover financial, data management, HR and is centrally controlled using technology and senior managers with agronomic backgrounds. Technology including GIS/ GPS systems are utilized with sowing rates set x speed. Minimal dust observed with all tractor cabs air-conditioned and containing carbon filters.

From an operational context the sites are in conformance with Leading Harvest Standards.

### Overall management system assessment:

The management plan is relatively straightforward with significant input from agronomists as to strategies employed based on soil testing results and seasonal conditions present at the time, soil amelioration including deep ripping and rolling to prepare seed beds, followed by sowing, input applications, harvest.

Based on last year's yields it is expected that the management plan prepared for the 2023-24 season will provide a sound result (seasonal conditions being what they are).

### Audit team recommendation regarding certification:

Subject to close out of items raised in the Desk Review of documentation, it is recommended that certification to the Leading Harvest Standard commence for Altora Ag.

**Next audit timing (month and year):** May 2024 (surveillance audit)

**Specific focus for next audit, if any, based on risk or opportunities for improvement:**

**Auditors Signature:**



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**Reviewers comments regarding certification:** Certification recommended following corrective action plan submission to minor CARs.



**Reviewers signature:**

**S.H 11/07/2023**

## **Objective 1. Sustainable Agriculture Management**

To practice sustainable agricultural stewardship to improve crop production and ensure long-term agricultural sustainability.

**Performance Measure 1.1 Sustainable Agricultural Stewardship:** *Standard users shall demonstrate their commitment to sustainable agricultural stewardship of farmland.*

### Summary of evidence:

AltoraAg demonstrates commitment to sustainable agricultural stewardship of farmland through implementation of their *Environment and Sustainability Policy*, which is made available to all staff within the operation; prior to application for Leading Harvest certification, AltoraAg had already implemented (and continues to meet) the requirements of a voluntary sustainability certification scheme, to which certification is currently held.

Sustainability goals are further articulated in the development of Nutrient Management Plans and Yield Targets, and in the entries for Sustainable Agriculture in the *Leading Harvest Chapter Document* and *AltoraAg Quality Manual*; stated priorities include the mapping of arable land, and the use of existing prime farmland whenever possible, with conversion of new farmland only following careful assessment of soil type and productivity, topography, yield performance history, and site improvements required (e.g. tree planting or establishment of floral biodiversity). Such decisions are made by consensus of the General Manager, Farm Managers, Lead Agronomist, and CEO.

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## Observations and Findings:

Verified the following operational aspects:

- Overarching policy for environment and sustainability
- OHS policy
- Chapter document provides a synopsis of LH Principles
- All staff have access to SharePoint and the Quality Manual v1
- Altor Ag Leading Harvest media release
- The farms have been operating under Altor Ag since 1<sup>st</sup> February 2023; profitability is based on low-cost production and Southern hemisphere seasonal advantages into Northern hemisphere markets;
- Induction training has taken place for farm staff.
- Reviewed IPM program (maintaining ground cover to establish beneficials for pest management, crop rotation to alleviate establishment of pest problem species).

**Performance Measure 1.2 Critical External Factors:** *Standard users shall manage for potential impacts of critical external factors to help ensure long-term profitability and sustainability of each farm or farm management unit by the Standard user.*

## Summary of evidence:

AltorAg demonstrate risk identification and assessment of the impact of external factors in such practices as the maintenance of an Environmental and Sustainability Risk Register, annual staff attendance at industry best-practice training, regular management reviews of material EH&S risks, internal and external audits and inspections to relevant Standards, and the development of seeding and harvest plans. These approaches are articulated clearly in AltorAg's *Quality Manual* and *Leading Harvest Chapter Document*.

## Observations and Findings:

Verified the following operational aspects:

- Business plans developed, including combination of CAPEX and OPEX budgeting.

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### **Objective 2. Soil Health and Conservation**

To maintain or enhance soil health to optimize crop yield and protect long-term soil productivity on agricultural lands.

**Performance Measure 2.1 Soil Health:** *Standard users manage nutrients and apply practices to achieve crop yield and maintain or enhance soil health of cropland.*

#### Summary of evidence:

AltoraAg demonstrates application of best management practices for maintenance and enhancement of soil fertility, as articulated in AltoraAg's *Quality Manual* and *Leading Harvest Chapter Document*. The goal is for reduced or zero tillage, and reduction of practices which might lead to erosion and compaction of soil. Regular inspection, testing, monitoring, and management of soils by qualified agronomists and farm managers is in place, each holding appropriate academic credentials. Soil is tested prior to seeding, with results permitting targeted application of management practices and inputs, avoidance of excessive input applications, and development of soil maps, crop nutrient plans and budgets, and fertiliser and crop rotation plans (including use of legumes). Progress is monitored throughout the season, with testing regimes inclusive of plant tissue and soil nutrients, carbon, and salinity, and regular field observations and photographs recorded.

Crop residues are maintained through minimal tillage, or partially incorporated into the soil, with even distribution of residues achieved by close attention to harvest management, and by cover cropping where operationally sound.

Application of technology for mapping Normalised Difference Vegetation Index of fields to be implemented.

#### Observations and Findings:

Verified the following operational aspects:

- Agronomists and Farm Managers interviewed and qualifications reviewed
- Farm Managers have many years' experience in the area and were very knowledgeable about their cropping programs
- Evidence of appropriate soil sampling and testing by suitably credentialed service providers.
- Soil addition and amendment records in response to testing were reviewed.
- Farm nutrient budgets, fertiliser product plans, and consultant reports reviewed.
- Fertiliser trials currently underway.
- Crop residue (stubble and pulverized harvest trash) is maintained in-field to minimise erosion, suppress dust, return nutrients. Minimum tillage is practiced, with nutrients added during seeding.

**Performance Measure 2.2 Soil Conservation:** *Standard users shall implement agricultural practices to minimize soil erosion and avoid degradation of agricultural lands.*

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### Summary of evidence:

AltoraAg demonstrates a commitment to in-field soil management via application of best management practices to reduce soil erosion, prevent compaction, and rehabilitate soils where necessary. Commitment best-practice soil management and to the prevention of agricultural land degradation is demonstrated by such practices as stubble retention, identification of soil constraints, strategic tillage, use of green manure, keeping up with grain industry R&D, application of green manuring practices, and soil sampling and testing to guide nutrient budgets and rehabilitation. These practices are outlined in AltoraAg's *Quality Manual* and *Leading Harvest Chapter Document* ("Soil Health and Conservation").

### Observations and Findings:

Verified the following operational aspects:

- Soil work is undertaken under the guidance of consultant agronomists in consultation with the Altora Ag agronomy team and senior managers.
- Use of both deep ripping, and ground cover (including crop stubble retention).
- There is a pan of hardened earth under the topsoil of AltoraAg's Western Australian farms. Practices vary (as required by soil type), and include cover cropping, mixing soils with stubble and crop trash, and using a single-pass, deep-rip/rolling system which has been observed to provide superior seedbed preparation in comparison to other methods.
- Soil testing is carried out on farms annually with cover cropping, crop rotation, and short fallow periods practiced.

### **Objective 3. Water Resources**

To protect water resources and manage water for efficient agricultural productivity.

**Performance Measure 3.1. Water Use:** *Standard users shall conserve water resources and manage water use to avoid long-term depletion and maintain crop productivity.*

Only limited withdrawal of water from groundwater resources. Agricultural production is dependent on rainfall. Dams are in place across AltoraAg's farms, with mapping in progress (said to be 70% complete). Water tanks provide water for spraying activities, predominantly fed by mains supply, and fitted with float cut-off valves to prevent overflow.

### Observations and Findings:

Verified the following operational aspects:

- Paddocks inspected demonstrated high moisture levels evident from recent rain.
- Most sites are exclusively dryland operations, reliant on rainfall events for crop watering.



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- Tank and bore waters are used for mixing chemical applications only, with multiple tanks observed at Temora (NSW).
- Maintenance of soil moisture was effective at Temora (NSW) and Queensland farms, noting retention of the previous year's crop stubble as ground-cover; sowing occurred directly into the stubble.
- The winter-dominant climate of Western Australia allows conservation of rainwater in the seedbed.
- Multiple weather stations are maintained on the Western Australian farms inspected, with up to 355 mm of rain recorded annually. Rainfall data recorded and made available to all consultants and Farm Managers.
- Solar-powered weather stations observed on Queensland farms. Data is relayed to consultants and Farm Managers for management decisions. Use of moisture probes observed.
- Weather stations observed at Temora (NSW), with data relayed to consultants and Farm Managers.

**Performance Measure 3.2. Water Quality:** *Standard users shall apply a program to properly manage the use of fertilizers and other soil amendments, crop protectants, and other inputs and avoid release of sediment and nutrients from agricultural lands into groundwater and surface water.*

Summary of evidence:

AltoraAg demonstrates best management practice in protection of groundwater from agricultural inputs, including appropriate training of staff, ensuring staff hold appropriate licenses and credentials for chemical handling and application, the movement of chemical to farms only as required, and immediate use of dry bulk inputs to avoid storage on-farm and to mitigate the risk of contamination of waterways and the surrounding environment. These strategies are articulated in AltoraAg's *Quality Manual* and *Leading Harvest Chapter Document* ("Protection of Water Resources").

Nutrient management plans are prepared by agronomists and are in use across the operation. Chemical use practices are covered in a relevant Standard Operating Procedure, tillage practices (zero or conservation tillage) ensure moisture retention in soil, drainage practices include biofilters and flow controls, trapping practices include terraces, grassed waterways, buffer/filter strips, and cover cropping.



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### Observations and Findings:

Verified the following operational aspects:

- For farms inspected, water run-off drains into natural waterways; native vegetation is maintained around these waterways.
- Seeding after the appropriate amount of fertiliser application, and pre-emergent herbicide if necessary.
- Minimal tillage, with direct seeding into stubble from previous crop

### **Objective 4. Crop Protection**

To achieve crop protection objectives while protecting people and the environment.

**Performance Measure 4.1. Integrated Pest Management:** *Standard users shall protect crops against pests by implementing an Integrated Pest Management program that uses regional agricultural best management practices to achieve crop protection objectives.*

### Summary of evidence:

Qualified agronomists carry out site visits and submit observation reports for review. Pest, weed and disease scouting records are maintained, and field histories reviewed, which include weed presence, growth stage, herbicides used, and use of non-chemical controls. Disease-resistant crop varieties are selected, seed treatments are used as required (with trials underway), “*low risk, least harmful, selective*” pesticides are chosen to preserve beneficial arthropods and bees (broad-spectrum insecticides are avoided), pest and weed thresholds that prompt intervention are determined by industry guidelines, and relevant staff attend agronomic “tech update” meetings. These strategies are articulated in AltorAg’s *Quality Manual* and *Leading Harvest Chapter Document* (“Crop Protection”). Additional controls implemented include fencing, crop rotations, and strategic planting dates.

Biosecurity practices include washdown of all vehicles, machinery, equipment, and shipping containers entering and exiting farms (“come clean and go clean” principle adopted); records maintained. Biosecurity signage is said to be in progress, farm hygiene is maintained, awareness of potential biosecurity threats made known to relevant staff.

### Observations and Findings:

Verified the following operational aspects:

- Crop pest monitoring is carried out by consultant agronomists and farm management/staff
- Any outbreaks are reported together with an activity plan for management to Altor Ag. A

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work order is raised, which specifies any products required and the field in question; for example, a mouse plague was evident, and following the agronomist's recommendation, controls were implemented.

- Data recorded on internal farm management software system
- Pesticides are stored centrally in a lockable chemical shed, and all relevant employees hold chemical applicator's licenses, which are maintained on file were checked during inspection.

**Performance Measure 4.2. Crop Protectant Management:** *Standard users shall select, use and store crop protectants in accordance with label instructions and regulatory requirements.*

Summary of evidence:

Relevant AltorAg staff complete chemical handling and application training, and have access via farm management software to Safety Data Sheets. Chemical storage is located at a central site to enable close surveillance of chemicals.

Observations and Findings:

Verified the following operational aspects:

- Inspected farm chemical storage sheds and mixing facilities
- All relevant Safety Data Sheets were on hand, with staff permitted immediate access via smart phones
- All chemical applicator license details are maintained.

**Objective 5. Energy Use, Air Quality, and Climate Change**

To conserve energy used by agricultural operations and minimize adverse impacts to the atmosphere and the global climate.

**Performance Measure 5.1 Agricultural Energy Use and Conservation:** *Standard users shall conserve energy resources, especially fossil fuels, used by agricultural operations.*

Summary of evidence:

As outlined in AltorAg's *Quality Manual*, fuel use is monitored with equipment-specific fobs and internal recording applications; machinery and equipment are well-maintained to optimise efficiency. Field passes are minimized, case studies have been raised for machinery options that increase fuel efficiency, solar panels are in place on Temora farms (NSW) and Altor's head office, electricity use and GHG emissions are monitored, and GHG inventories provided.

Observations and Findings:

Verified the following operational aspects:

- Inspected new tractors at Western Australian farms, which feature significantly more efficient use of diesel; purchases a part of CAPEX proposals, which justify the investment. Sighted the use of single-pass, minimum-till cultivator at work, and observed the use of back-up

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generators, for use in instances of power failure. Solar panels in use on farmhouses, and planned for installation.

- Noted the tractors in use on Queensland farms have reduced diesel usage by 25%, compared with previously-used models. Sighted a single-pass planter at work, photographs attached to report, manufactured and supplied by a local business. Solar panels installed on some farmhouses and on weather stations.
- At Temora, NSW, contractors provide tractors, and fuel use is recorded. Noted the use of single-pass planters at work during inspection. Solar panels in place on weather stations.

**Performance Measure 5.2 Air Quality:** *Standard users shall minimize adverse impacts to air quality from agricultural operations.*

Summary of evidence:

AltoraAg's *Quality Manual* urges prioritisation of low-emissions technologies whenever operationally sound. Burning of stubble to occur only as a last resort, and single-pass machines used where possible. GHG emissions inventory provided.

Observations and Findings:

Verified the following operational aspects:

- Tractors are fully-enclosed, air conditioned, with most equipped with GPS guidance systems.
- Stubble retention for dust reduction.
- Some roads on the Queensland farms are graveled, and in high-traffic areas (e.g. around silos), roads are watered when in use.
- Graveling of high-traffic areas and some roads on Temora farms.
- Fuel use is monitored.

**Performance Measure 5.3 Climate-Smart Agriculture:** *Standard users shall apply the principles of climate-smart agriculture to reduce adverse impacts to the global climate and adapt to climate change.*

Summary of evidence:

GHG inventories have been provided, and a GHG emissions baseline for Altora farms is being developed with data collated by an external GHG consultant. A project plan for carbon sequestration activities will be established in due course. Zero or conservation tillage practices, minimisation of input use, and use of single-pass machinery and targeted, precision ag practices have already been implemented, and a Precision Ag Manager has been appointed.

In preparedness for severe weather events, crop insurance policies are implemented following careful review, Emergency Action Plans developed, and long-term weather forecasts obtained via

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the Bureau of Meteorology. On-farm weather stations in place across AltorAg farms. These plans have been articulated in AltorAg's *Quality Manual* (section 6.6.4) and *Leading Harvest Chapter Document* ("Energy use, air quality and climate change").

### Observations and Findings:

Verified the following operational aspects:

- A greenhouse gas baseline is being developed.
- Three years of GHG emission records reviewed, with spreadsheets attached to audit report
- Farm Managers are members of regional committees and boards.
- Collection of weather data via in-field weather stations, data used by agronomists for decision-making.
- Annual farm plans developed by suitably qualified agronomists.

### **Objective 6. Waste and Material Management**

To manage waste, agricultural chemicals and other materials from agricultural operations to minimize their adverse impacts to agriculture and the environment.

**Performance Measure 6.1 Management of Waste and Other Materials:** *Standard users shall minimize solid waste and hazardous waste from agricultural operations and manage waste and agricultural chemicals in compliance with applicable laws, statutes and regulations.*

### Summary of evidence:

Waste management is articulated in AltorAg's *Quality Manual* (section 6.8.1) and *Leading Harvest Chapter Document* ("Waste and Material Management"). ICBs are recycled, and participation in drumMUSTER and ChemClear programs is in place. Storage tanks are inspected regularly for leaks and replaced if required. Waste oil is stored in areas in which spills can be contained, and the services of local licensed waste contractors are utilised.

### Observations and Findings:

Verified the following operational aspects:

- drumMUSTER compounds are used for storing unused, cleaned chemical containers
- Staff awareness of ChemClean for unwanted chemical was evident.
- Waste oil is collected by appropriate service providers.
- Relevant staff are trained in chemical application – licenses sighted
- Observed that household waste is transported to the local tip.
- Chemical storage sheds are bunded, with waste and overflow draining into a sump system and collected in tanks.
- Safety Data Sheets were sighted in the chemical sheds, and relevant staff have immediate smart-phone access.
- Used tyres are collected by local vendors, and skip bins in place for collection of general waste awaiting disposal

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- Contractors operate under signed agreements and are inducted for all operational activities undertaken.

**Performance Measure 6.2 Food and Agricultural Waste Resource Recovery:** *Standard users shall ensure efficient handling and recovery of agricultural products and agricultural waste.*

Summary of evidence:

As expressed in AltoraAg's *Quality Manual* (section 6.8.4) and *Leading Harvest Chapter Document* ("Waste and Material Management"), sites are monitored closely to ensure pre- and post-harvest loss of crop is minimised. Stubble from the previous crop could be viewed as a waste product; where operationally suitable, stubble is retained in the soil rather than baled, and only ever burned as a last resort. Any crop losses are discussed during annual harvest reviews. Harvested product impacted by pests during storage (that cannot be salvaged) is disposed of at local refuse centres. Mulching being considered, but currently waste is sent to landfill.

Observations and Findings:

Verified the following operational aspects:

- Harvest times are recommended by contract agronomists in consultation with farm managers and agronomic staff to ensure crop waste is minimized.
- All grain harvested goes directly into chaser bins, and is transported by truck directly to bulk rail-side grain storage facilities.
- All harvest residue/trash is left in the field – this includes stalks and pulverized grain trash, which is left as ground cover and returned into the soil the following year.

**Objective 7. Conservation of Biodiversity**

To manage farmland in a manner that maintains agricultural production while conserving biodiversity where appropriate or legally required.

**Performance Measure 7.1 Species Protection:** *Standard users shall protect threatened and endangered species and viable occurrences of at-risk species.*

Summary of evidence:

AltoraAg is currently developing a "*Biosecurity and Biodiversity Standard*"; according to Altora's *Quality Manual* (section 6.9.1) and *Leading Harvest Chapter Document* ("Conservation of Biodiversity"), the "*Biosecurity and Biodiversity Standard*" will outline requirements for employees in relation to threatened species. Ecological assessment and improvements also form part of Altora's Due Diligence processes.

The *Atlas of Living Australia* has been cited to assist farm managers in identifying threatened and endangered species that might be present on farm.

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No threatened species have been identified on any of Altora's farms to date; within 5 km of some sites, threatened bird species have been observed, including the Painted Honeyeater, Swift Parrot, Superb Parrot, and Malleefowl.

### Observations and Findings:

Verified the following operational aspects:

- 5-10% of AltoraAg farms in Western Australia and Temora, and 20% in Queensland, exist in their natural state, with flora and fauna native to the region (e.g. emus, kangaroos, mallee fowl).
- Some culling of kangaroos when required.
- Feral pigs are trapped or culled.
- There are no threatened species known to exist within 5 km of any farm sampled for inspection this audit.
- Ecological assessments form part of AltoraAg's Due Diligence processes.
- CSIRO's database *Atlas of Living Australia* consulted

**Performance Measure 7.2 Wildlife Habitat Conservation:** *Standard users shall conserve native habitats, wildlife habitat, natural communities and Ecologically Important Sites on enrolled farmland.*

### Summary of evidence:

AltoraAg is currently developing a "Biosecurity and Biodiversity Standard", which will outline the requirements for protection of flora and fauna. Currently, conservation decisions are made by consultation between lead agronomists, General Manager, and Farm Managers. Altora is actively involved with LandCare NSW at a number of sites to carry out tree planting on areas unsuitable for cropping. Due Diligence processes include assessments of erosion, declared weeds and pests are managed according to legislation, and preservation of native trees and other vegetation provide corridors for movement of native fauna and also harbour beneficial insects and predators. Application of pesticides is carried out in such a manner as to minimise impact on native habitat. No-till practices and cover cropping provide additional habitat for many months of the year, technical advice is sought prior to any ground works or removal of habitat materials, and riparian areas are preserved. These strategies are articulated in AltoraAg's *Quality Manual* (section 6.9.2) and *Leading Harvest Chapter Document* ("Conservation of Biodiversity").

### Observations and Findings:

Verified the following operational aspects:

- Western Australian Farm Manager has membership in the Merredin & Districts Farm Improvement Group (MADFIG) and the Far Eastern Agricultural Research Group (FEAR).
- Nil issues noted during farm inspections.
- Observed that fields post-harvest are maintained with stubble and trash remaining on the ground during fallow periods, potentially providing additional habitat.



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- Native habitat is maintained in riparian zones, along waterways, and in timber belts.

**Performance Measure 7.3 Avoided Conversion:** *Standard users shall avoid conversion of natural forests, other natural communities and Ecologically Important Sites.*

Summary of evidence:

AltoraAg is currently developing a “*Biosecurity and Biodiversity Standard*”; land use conversion is already covered in Altora’s *Environment and Sustainability Policy*. Technical advice is sought prior to initiation of ground works or removal of habitat materials, and practices are in place for protection of remnant vegetation. Management of declared pests and weeds is according to legislation, and sensitive areas are identified and efforts taken to ensure they are protected from spray drift (as detailed in Altora’s procedure for pesticide spraying). Altora’s commitment to zero deforestation is articulated in their *Leading Harvest Chapter Document* (“*Conservation of Biodiversity*”), *Quality Manual* (section 6.9.3, which states a target of zero deforestation by 2025, based on Science Based Targets initiative), and *Deforestation Policy* (which states a goal of alignment with the UN *Sustainable Development Goal 15*).

Ensuring investments and land acquisitions do not directly or indirectly contribute to deforestation or violation of relevant laws and regulations forms part of Altora’s Due Diligence processes.

Verified the following operational aspects;

- Non-arable areas including swamp land, hill tops, ridges, riparian zones, waterways, and naturally-timbered tree belts are set aside for conservation purposes.
- No deforestation takes place.

**Performance Measure 7.4 Crop Diversity:** *Support crop diversity on cropland.*

Summary of evidence:

Numerous varieties of grain, Canola, and pulse crops are grown by AlroaAg; identified in Altora’s application documents are varieties of wheat, Canola, barley, oats, faba beans, lentils, field peas, lupins, and vetch.

As articulated in Altora’s *Quality Manual* (section 6.9.4) and *Leading Harvest Chapter Document* (“*Conservation of Biodiversity*”), lead agronomists and their teams ensure several crops are chosen each season in accordance with best management practices, including the sowing of legumes, consideration of soil requirements, weed management, crop rotation, cover cropping, and ongoing monitoring.

Observations and Findings:

Verified the following operational aspects:



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- On Altora's New South Wales, Victorian, and Queensland farms, fields are left in short fallow prior to the following year's rotation.
- Weeds are managed with knock-down and pre-emergent herbicides; retention of stubble or cover cropping is used to control erosion. Noted ryegrass and wild radish are the primary weeds in WA.
- All management is under the direction of consultant agronomists who report to Altora Ag fortnightly.

### **Objective 8. Protection of Special Sites**

To manage Special Sites on farmland that are geologically or culturally important in a manner that recognizes and respects their unique qualities.

**Performance Measure 8.1 Special Site Management:** *Standard users shall manage Special Sites in a manner appropriate for their unique qualities.*

#### Summary of evidence:

- Altora Ag's assessment of special sites of indigenous importance (using existing databases: *Australian Heritage Database, Australian Heritage Information Management System (AHIMS) Web Services, Victorian Heritage Register, and the Aboriginal Heritage Inquiry System (WA Department of Planning, Lands and Heritage)*) revealed zero Aboriginal sites or places on or near Altora farms Goldens, Mayfair, Moore Park, Orana Park, Stewarts, Winkleys, Bodallin, and Catumnal.
- 2 registered Aboriginal sites were identified in the proposed search area in the vicinity of Erregulla Park, Mingenew, Western Australia: Lockier River (restricted location), and Lockier River, Mingenew (Mingenew Nature Reserve, coordinate provided): both as indigenous water sources, the former also with "mythological" significance.
- AltoraAg's Leading Harvest Chapter Document ("Protection of Special Sites (Social and Cultural)") refers to a "Special Sites Standard", currently in development and due for completion by end of October 2023. The Standard to be created, implemented, and made available to all staff via Altora's internal software platform. All staff are to stop work and alert management (when safe to do so), should they suspect discovery of culturally significant items of locations.
- Altora's Quality Manual (section 6.10.1) requires Farm Managers to ensure "*special sites are managed in an appropriate manner*", and that each Altora site be assessed "*for the presence of any existing sacred sites, conducted through government heritage databases*".

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### Observations and Findings:

Verified the following operational aspects;

- Visited one special site in WA.
- Confirmed no sites have been identified on NSW, Queensland and Victorian farms inspected.

### **Objective 9. Local Communities**

To operate safely and responsibly; contribute to the economic well-being, social networks and health of local communities; and to recognize and respect the rights of local communities and Indigenous Peoples in regions of agricultural operations.

**Performance Measure 9.1 Economic Well-Being:** *Standard users shall foster the economic vitality of local communities through business practices that support sustainable agriculture and the local economy.*

### Summary of evidence:

AltoraAg's *Leading Harvest Chapter Document* ("Local Communities") articulates Altora's commitment to support local contractors for on-farm activities, movement of grain, and logistics, for office supplies, and for trade services and automotive repairs as required.

Altora's *Quality Manual* (section 6.11.1) requires employees to "*nurture and promote the vitality of local communities through economic means... focus on prioritising local procurement of services and supplies where operationally sound... [support] local contractors... [and] locally source agricultural products*".

Noted the employment of summer interns (e.g. agronomists) from regional agricultural universities.

### Observations and Findings:

Verified the following operational aspects;

- Interviews with Farm Managers revealed that farm employees were sourced from the local area.
- Award or above-award rates paid for a 38-hour work week. All employees paid directly.
- All employee records are maintained electronically in internal WHS software system.
- Noted in the Queensland report, that farm supplies and services (e.g. spray equipment calibration) were generally purchased from local businesses. Invoices reviewed.
- Noted that direct employment of staff for full-time and casual positions in WA is from local residents (some of whom live in and rent houses on-farm), and that purchases are made from local business houses.
- For the Victorian and NSW farms, employees are sourced locally for direct-hire, full-time and casual positions (some of whom reside on-site in rented homes). Purchase invoices from

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local suppliers were noted during inspection (e.g. Elders, Boort, VIC).

**Performance Measure 9.2 Community Relations:** *Standard users shall engage local communities to increase community awareness and support for the practice of sustainable agriculture and maintain or enhance Standard user reputation.*

Summary of evidence:

Altora's *Quality Manual* (sections 6.11.2, 6.11.3 & 6.11.4) and *Leading Harvest Chapter Document* ("Local Communities") cite Altora's "many stories" of employees in community leadership roles, notably the NSW Rural Fire Service. Community participation is supported by Altora's "Community Service Leave" policy (e.g. staff are entitled to leave accrual by participation in Voluntary Emergency Management Activities). Working relationships exist between Farm Managers and neighbouring operations, and Managers' contact details on the company website permits community contact.

A number of community programs are sponsored, including local sporting clubs, community events, youth mental health awareness, Salvo's Red Shield Appeal, "Movember", school fundraisers, Food Bank, local New Years' events, and the Clontarf and Stars Foundations (which support indigenous youth, including support to finish school, adopt a healthy lifestyle, study, self-discipline, and transition to tertiary study or the workforce).

Observations and Findings:

Verified the following operational aspects;

- Confirmed sponsorship of the Rural Fire Brigade and various local sporting groups; an area is set aside for local primary school P&C, who receive the annual proceeds from crop sales.
- Confirmed sponsorship of Childcare, Football Club, and P&C Association through time and donation.
- Confirmed sponsorship of local kindergarten through time and donation, and a farm education tour for local high school students.

**Performance Measure 9.3 Local Communities and Indigenous Peoples:** *Standard users shall recognize and respect rights of local communities and the treaty rights of Indigenous Peoples.*

Summary of evidence:

AltoraAg's commitment to local communities and indigenous peoples is articulated in their *Environment and Sustainability Policy*.

Altora's *Quality Manual* (section 6.11.4) requires all staff to "respect the rights of the local communities and indigenous peoples", notes that community involvement of staff is supported through a "Community Service Leave" policy, encourages membership in the NSW Rural Fire

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Service, and articulates Altora's "commitment to recognising and respecting the rights of the local community and indigenous people".

According to Altora's *Leading Harvest Chapter Document* ("Local Communities"), land tenure rights of local communities and indigenous peoples are assessed at the time of purchase by external consultants, who provide insight into existing land rights, including searches for Special Sites, and water, hunting, fishing, and other land access rights.

Altora's *Quality Manual* (section 6.11.5) instructs "all staff involved in the acquisition of further farmland... conduct due diligence to avoid violating land tenure rights". This aspect of Altora's Due Diligence is applied upon land purchase, simultaneously with Environmental Due Diligence processes by external consultants, and in addition to government database searches for sites of special cultural significance. Correspondence with external consultants and results of government database searches have been provided to and reviewed by ACO.

### Observations and Findings:

Verified the following operational aspects:

- The Clontarf and Stars Foundations, supported by AltoraAg, have been running in Australia for 50 years.
- All employees are inducted at commencement using an on-line program that covers: bullying, harassment, anti-discrimination, drugs & alcohol, and termination of employment.
- Land tenure right of indigenous communities are assessed and managed during the Due Diligence checks when purchasing farms.

**Performance Measure 9.4 Public Health:** *Standard users shall apply measures to protect public health from adverse impacts of enrolled farmland.*

### Summary of evidence:

AltoraAg's *Quality Manual* (section 6.11.7) and *Leading Harvest Chapter Document* ("Local Communities") articulate Altora's commitment to ensure the following:

- That storage and use of crop protectants conform to legal requirements.
- That application of chemicals is by licensed pesticide applicators.
- That Safety Data Sheets are readily available.
- The protocols are in place to mitigate the risk of spray drift.
- That management of spills conforms with Standard Operating Procedures.

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- That tyres and chemical containers that no longer meet operational requirements are properly disposed of, recycled, or replaced.
- That induction records and chemical operator (ChemCert) licenses are maintained on an internal WHS software system.

Altora's *Quality Manual* articulates the commitment of Altora management to implement health & safety practices, and to provide proper training to employees in the safe operation of farm equipment.

Noted that aspects of workplace health & safety are covered by Altora's Environment and Sustainability Policy.

For contracted services, agreements include commitment to Good Industry Practice for works performed, including "contractor obligations" to use plant & equipment that are fit for purpose, to comply with relevant WH&S laws, to ensure equipment complies with relevant safety codes and laws, to notify Altora of any incidents, and to upon request prepare a WH&S management plan.

Noted that agricultural chemicals are stored off-farm, at a central location to mitigate risk of misuse and mishandling.

Safe Work Procedures (including training required, PPE, necessary equipment, identification of hazards and risks, work procedures, and emergency responses) provided to ACO that cover:

- Pesticide spraying
- Procurement of chemicals
- Transport of dangerous goods
- Refueling
- Bunker operations
- Field work on motorcycles and off-road vehicles
- Extraction of bogged vehicles
- Harvest activities
- Stubble burning
- Asbestos management and removal

Emergency plans in place. Spill kits available. Records of equipment calibration and checks, and regular checks of storage tanks and fire extinguishers maintained. Aspects of WHS policy, critical controls, dealing with injuries, environmental policy & response, COVID-19 policy, emergency evacuation, first aid, PPE, safety & warning signage, fire management, confined spaces, electrical safety, working at heights, work platform & ladder safety, welding & cutting operations, compressed gas, manual handling, and working at extreme temperatures are additionally covered by Altora's *Employee Handbook* and *Health, Safety & Environment (HSE) Handbook*.

Observations and Findings:

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Verified the following operational aspects;

- Noted Toolbox meetings held to discuss aspects of WH&S
- Sighted farm signage, safety equipment, and locked Chemical sheds.
- Viewed spill kits, bunding, and sump/waste storage systems.
- Noted use of Smartphones by relevant employees and contractors to immediately access Safety Data Sheets.
- Management confirmed that random drug tests take place.
- Equipment is calibrated by employees or contractors.

### Objective 10. Personnel and Farm Labor

To provide a safe and healthy working environment, fair compensation and training for Standard user personnel, contract management company employees and contract farm labor necessary to improve the practice of sustainable agriculture.

**Performance Measure 10.1 Safe and Respectful Working Environment:** *Standard users shall foster a culture of safety and respect among Standard user personnel and contract management company employees to minimize injuries, help establish safe routines and enhance employee productivity.*

#### Summary of evidence:

Altora's *Leading Harvest Chapter Document* ("Employees and Labour") and *Quality Manual* (section 6.12.1) articulate Altora's commitment to be an equal opportunity employer, to maintain a "safe, gender equitable, and professional work environment", to workplace diversity, and to be a workplace that does not discriminate.

Job advertisements express Altora's stance as an equal opportunity employer (an example was forwarded to ACO for review), Fair Work information statements are sent to all employees, and Altora's values are further expressed in their *Policy & Procedures Manual*, noting it is unlawful to discriminate on the basis of "sex (including pregnancy), race, colour, nationality, descent, ethnicity, religion, marital status, disability, sexuality (actual or assumed), gender identity, age, carer responsibilities, political beliefs, union membership, or previous criminal record irrelevant to the position".

Altora's *Employee Handbook* expresses their three core "operating principles": "People, Product and Place", with "People" covering the provision of a safe and innovative work environment for staff, and including expectations (code of conduct, care for company resources, conflicts of interest, confidentiality), safety & environment (WHS policy, critical controls, dealing with injuries, environmental policy & response), and work policies (probationary period, work hours, attendance, pay, training and development, performance appraisal, salary reviews, flexible work arrangements, leave, motor vehicles, credit cards, travel, dress and appearance, raising concerns, disciplinary measures, communication).



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### Observations and Findings:

Verified the following operational aspects:

- Every employee undergoes a company WH&S induction and medical examination prior to starting work.
- All records and policies are maintained on company intranet and WHS systems.
- Award conditions are made available to staff using company's payroll solutions software.
- Employees submit weekly timesheets and are paid fortnightly, directly into their accounts – advice is by email.
- Temora HR Manager interviewed, who confirmed the detail above.

**Performance Measure 10.2 Occupational Training:** *Standard users shall provide training for Standard user personnel and ensure adequate training for contract management company employees necessary to improve the knowledge and practice of sustainable agriculture.*

### Summary of evidence:

AltoraAg's *Leading Harvest Chapter Document* ("Employees and Labour") and *Quality Manual* (section 6.12.1) require site inductions for all employees and contractors, that all employees "*have access to workplace health and safety education and training*", and that training history is maintained on Altora's intranet WHS system.

The content of Altora's Farming EHS (Environment, Health & Safety) Induction was provided to ACO as a PowerPoint file for review, covering such aspects as a "welcome to country", commitment to safety, key personnel, EHS policies, overview of relevant legislation, roles & responsibilities, risk management processes, critical controls for various types of work, work permits, hazard reporting, injury management and first aid, emergency preparedness, expected behaviours, fitness for work, drug & alcohol policy, PPE, noise management, visitor management, mental health, and environment & sustainability.

Excerpts of their training history reports demonstrate maintenance of such records as name of trainee, the element trained, identity of the training provider, date and location of training, and the date a refresher is due.

### Observations and Findings:

Verified the following operational aspects;

- All relevant training records for each employee are maintained in Altora's WHS system.
- Interviewed farm management regarding OH&S.
- Appropriate safety signage was observed during the farm inspections.



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- “Toolbox” WHS meetings are held with attendance lists maintained.
- ChemCert/ChemSafe qualifications are maintained for all chemical applicators in WHS intranet system.
- All contractors have signed agreements.

**Performance Measure 10.3 Supporting Capacity for Sustainability:** *Standard users shall require appropriate training of Standard user personnel and contract management company employees so that they are competent to fulfill their responsibilities under the Leading Harvest Standard.*

Summary of evidence:

AltoraAg’s *Leading Harvest Chapter Document* (“Employees and Labour”) and *Quality Manual* (section 6.7.1) include a Sustainability Policy Commitment; an ESG policy framework is being implemented within the company, and communicated throughout the organisation. Onboarding includes training to Altora’s Leading Harvest commitment statements, and a sustainability expert has been employed to provide training to Altora’s CPO, Lead Agronomist, HR Manager, Data Manager, and Safety Committee. The agenda of AltoraAg’s “*Leading Harvest Kickoff Meeting*” has been provided to ACO, which covered introduction to sustainability, ESG, and Leading Harvest, HR aspects, identification of gaps, and “next steps”.

Altora’s *Quality Manual* (section 6.7.1) states: “*AltoraAg is committed to sustainable ag management and will work to implement sustainability of the business and the places we operate... To ensure we are successfully managing all aspects of sustainability we are to implement the Leading Harvest Farmland Standard*”.

Further, 6.12.3 of Altora’s *Quality Manual* states: “*Sustainability commitment and training of Leading Harvest is to be communicated to key staff members. Staff are to have sufficient training and education in order to fulfil their roles and responsibilities*”.

Relevant credentials of “sustainability expert” provided.

Observations and Findings:

Verified the following operational aspects;

- Sustainability training for managers and for farm employees;
- Interviewed and sighted agronomy qualifications of Altora’s agronomists.
- Relevant training records are maintained in Altora’s intranet WHS system.
- Farm Managers attend regional field days.

**Performance Measure 10.4 Compensation:** *Standard users shall ensure adequate livelihood for employees and contract management company employees to attract and retain a stable workforce.*

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### Summary of evidence:

AltoraAg's *Leading Harvest Chapter Document* ("Employees and Labour") articulates Altora's commitment to paying employees a salary which is "fair, equitable, legal, and competitive". Salaries are reviewed annually in July, and minimum legal wages and compensation are set by Fair Work Australia (under the Pastoral Award, which includes broadacre cropping activities).

Altora's *Quality Manual* (section 6.12.4) reiterates this, requiring "all staff... be provided a livable wage... AltoraAg is committed to pay each employee a salary which is fair, equitable, legal and competitive".

### Observations and Findings:

Verified the following operational aspects;

- Farm operations staff are engaged under the terms and conditions contained within the current Awards for "Pastoral", "Transport & Logistics", "Clerical (Clerks – Private Sector)", and "Vehicle Repair, Services and Retail".
- Engaged under Fair Work and there is an Enterprise Agreement for drivers of Heavy Vehicles.
- Interviewed and checked credentials of HR Manager, Commercial Manager, and Payroll Manager to confirm terms and conditions of employment and Awards structures.
- Timesheets received from employees weekly via app, payslips are emailed.
- Salaries reviewed annually in July.
- A *Contractors & Labour Hire Policy* is in place.
- Contractor Agreements in place for all farm related activities.
- Housing is offered to full-time, farm-based employees in remote areas.

**Performance Measure 10.5 Farm Labor:** *Standard users shall monitor contract management Companies or farm labor contractors to help ensure farm labor working conditions consistent with the Principles and Objectives of Leading Harvest Standard.*

### Summary of evidence:

AltoraAg's *Leading Harvest Chapter Document* ("Employees and Labour") articulates Altora's Farm Labour Monitoring Program, which includes processes which ensure labour contractors are hired within requirements of applicable labour laws. A "*Contractors and Labour Hire Providers Policy*" has been implemented to ensure employees hired through labour hire agencies are receiving appropriate remuneration.

Their *Quality Manual* (section 6.12.5) requires farm labour contractors "be supported by the same policies and procedures as AltoraAg staff", and that "due diligence is conducted prior to engaging a third-party labour hire provider and requires a compliance questionnaire to be completed prior to their engagement".

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## Observations and Findings:

Verified the following operational aspects;

- Contractor Agreements are in place for all farm related activities.

## **Objective 11. Legal and Regulatory Compliance**

To comply with applicable federal, state and local laws, statutes, and regulations.

**Performance Measure 11.1 Legal Compliance:** *Standard users shall comply with applicable federal, state and local agricultural and related social and environmental laws, statutes, and regulations.*

## Summary of evidence:

AltoraAg's Quality Manual (section 6.13.1) and Leading Harvest Chapter Document ("Legal Compliance") require "*all information relevant to legal compliance... be accessible to all staff as required to complete their duties*". Internal software systems are in place to allow staff immediate access to compliance information, safety updates, and inductions. Relevant legislation and safety updates are also communicated to employees via inductions, workshops, and on-site posters. Staff are required to hold relevant competencies, professional licenses, and accreditations for regulatory compliance, and internal and external audits and reviews are carried out to ensure compliance measures are maintained.

Commitment to compliance is demonstrated by maintenance of relevant records and staff licenses (examples of licenses held among staff include *Electrical Testing & Tagging, First Aid, CPR, Confined Spaces, and Issuing Work Permits, Hazard Analysis, and Gas Test & Risk Control*).

## Observations and Findings:

Verified the following operational aspects;

- Safety Policies prominently displayed on the Staff Noticeboard.
- Appropriate signage observed on farm entrances and around the farm, indicating safety requirements, hazards etc.
- Safety Data Sheets sighted.
- Ongoing training is provided through Toolbox meetings.
- Procedures Manual inspected, noting farm inductions for all incoming employees – other documents available to staff through company's intranet system.
- Competency and training records are maintained in WHS intranet system for each employee.
- All employees are engaged under the terms and conditions contained within the current Awards for "Pastoral, Transport & Logistics", "Clerical (Clerks – Private Sector)", and "Vehicle Repair, Services and Retail".

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- Engaged under Fair Work, and there is an Enterprise Agreement for Drivers of Heavy Vehicles.
- Viewed Chemical User licenses for relevant staff.

**Performance Measure 11.2 Legal Compliance Polices:** *Standard user shall take appropriate steps to comply with all applicable social laws at the federal, state and local levels in the jurisdictions where the Standard user operates.*

Summary of evidence:

A compliance commitment statement is included in Altora's *Environment and Sustainability Policy*, and their *HR Policies & Procedures Manual* document outlines expectations of all employees; employees are introduced to these and other relevant policies during their company induction.

Their *Leading Harvest Chapter Document* ("Legal Compliance") and *Quality Manual* (section 6.13.2) requires Altora's alignment with International Labour Organisation conventions and Australian work, health & safety regulations; it is noted that Australia has ratified ILO Conventions applicable to WH&S, including C155 and P155. Through Altora's application and onboarding processes, age and work visa requirements are checked to ensure requirements are met.

Observations and Findings:

Verified the following operational aspects;

- Farm inductions for all incoming employees.
- Competency and training records are maintained in company's intranet WHS system for each employee.
- Procedures Manual inspected, noting farm induction for all new employees.
- All employees are engaged under the terms and conditions contained within the current "Pastoral", "Transport & Logistics", "Clerical (Clerks – Private Sector)", and "Vehicle Repair, Services and Retail".
- Employees are engaged under Fair Work, and there is an Enterprise Agreement for Drivers of Heavy Vehicles.
- Confirmed that there are no tenants of leased land.

**Objective 12. Management Review and Continual Improvement**

To promote continual improvement in the practice of sustainable agriculture by conducting management reviews and monitoring performance.

**Performance Measure 12.1 Farm Review and Continual Improvement:** *Standard users shall establish a management review system to examine findings and progress in implementing the Leading Harvest Standard, improve resource-use efficiency of agricultural production, make appropriate improvements in programs, and inform their employees of changes.*

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## Summary of evidence:

AltoraAg's *Leading Harvest Chapter Document* ("Management Review and Continual Improvement") articulates Altora's commitment to performance review: internal performance appraisals of staff are carried out by managers, providing a structured format for discussion. Position descriptions are reviewed and updated annually and KPIs set. Crop plans are assessed at the end of each harvest to discuss learnings and to implement necessary changes. Yield and budget target reviews are presented to the Altora board and monitored by management throughout the reporting period; if targets are not met, management is briefed on the reasons why, and actions are implemented. Altora's *Policies & Procedures Manual* covers individual employee performance appraisals, "on the principle of reinforcing performance strengths and providing opportunity to discuss and address performance deficiencies".

There is monthly reporting in place to track progress in meeting yields, completing internal projects, and meeting budget targets. Ongoing GHG assessments are in place to monitor carbon emissions and sequestration activities through the guidance of consultants. IPM and nutrient management programs are monitored by experienced and credentialed agronomists, and annual Leading Harvest assurance assessments will be implemented.

Fuel consumption is assessed with all CapEx case studies, in attempt to increase efficiency, reduce environmental impact, and increase product value. Agronomists carry out site-specific trials of various rates and timings of input application, with view to improving application of treatments and improving efficacy.

Altora's *Quality Manual* (sections 6.12.3, 6.13.1, 6.14.1 & 6.14.2) requires "all staff... to conduct ongoing performance reviews across the organization... annual performance appraisals... crop plans [that] are assessed at the end of each harvest to discuss learnings with Lead Agronomists to implement any changes for the following season... [and] relevant staff are... required to implement the annual Leading Harvest Assurance Assessment". WH&S audits are carried out and results stored on Altora's internal WHS system. The Quality Manual also reiterates the requirements for relevant staff to "conduct ongoing GHG assessments", and to "collect, review, and report information that is beneficial to... evaluating efficiencies and measuring progress".

## Observations and Findings:

Verified the following operational aspects;

- Management review is ongoing, with meetings held each Monday. Relevant information for the meetings' agendas are received on the preceding Friday from regional and farm management. Minutes are maintained.
- Fortnightly reports are generated by Altora's agronomy team and consultant agronomists and submitted to Farm Managers, as determined by interviews with relevant employees.
- Implementation of precision agricultural practices, soil mapping being implemented across Altora farms, improvement of infrastructure and equipment (e.g. spray rig, chaser bins, water

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tanks), and measuring soil carbon in collaboration with the University of Melbourne.

Leading Harvest Indicator	C/NC/MNC*	Audit result
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**Performance Measure 12.2 Support for Sustainable Agriculture:** *Standard users shall individually and/or through cooperative efforts support science-based agricultural research programs or partnerships or other efforts by associations to improve soil health, agricultural productivity and sustainable agriculture.*

Summary of evidence:

AltoraAg's *Leading Harvest Chapter Document* ("Management Review and Continual Improvement") and Quality Manual (section 6.14.3) note that agronomists carry out site-specific trials of various rates and timings of input application, with view to improving application of treatments and improving efficacy (examples cited include herbicide and fungicide efficacy trials in wheat crops in 2022, investigating pesticide effects on weeds and on Septoria and stripe rust, respectively). Altora maintains close participation in and support of individual and collaborative research, including recent collaboration with Murdoch University around chemical residues within tractor cabins and on equipment, and associated impacts on human safety.

Observations and Findings:

Verified the following operational aspects, examples include:

- ALTORA AG is working in collaboration with district improvement & research groups with multiple associated trials conducted.
- Attendance at relevant university Field Days.
- Soil chemistry trials.
- Trials conducted include fertiliser use, herbicide, technology utilisation, soil amelioration etc.

**Objective 13. Tenant-Operated Operations**

To promote the use of regional agricultural best management practices on farmland leased by farmland tenants to broaden the practice of sustainable agriculture and to promote the efficient use



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of agricultural inputs and the management of adverse environmental impacts
<b>Performance Measure 13.1 Leased-Land Management:</b> <i>Standard users shall clearly define and implement strategies to ensure that farmland tenant activities adhere to the principles of sustainable agriculture.</i>
Not applicable. Nil tenants or leased lands.
<b>Performance Measure 13.2 Leased-Land Monitoring:</b> <i>Standard users shall monitor agricultural practices used by farmland tenants to ensure their consistency with regional agricultural best management practices.</i>
Not applicable. Nil leased lands.

Non-conformances	MNC/NC*	Standard Element
<ul style="list-style-type: none"> <li>• description and evidence at the performance measure level</li> <li>• corrective action plans</li> </ul>	*MNC Major Non-Conformance, NC Conformance	
<i>Community Engagement - Agricultural focussed community engagement.</i>	Minor NC	Indicator 9.2.1
<i>Special Site Management - Special Sites Standard.</i>	Minor NC	Indicator 8.1.2
<i>Native Habitats and Natural Communities - Biosecurity and Biodiversity Standard.</i>	Minor NC	Indicator 7.2.1
Opportunities for improvement (description and evidence)	Standard Element	
<i>The following operational areas have been identified as focus areas for improvement based upon observation from audit:</i> <ul style="list-style-type: none"> <li>• Senior management review policy and oversight document development,</li> <li>• Compilation of information across the operation,.</li> <li>• Continued harmonisation of documentation,</li> <li>• Indigenous engagement policy and procedures development,</li> <li>• Communication policy regarding Leading Harvest principles development. .</li> </ul>		
<i>Provision of EHS audit and/or inspection reports.</i>		Indicator 10.3.2
<i>Update on development of a Local Community and Indigenous People Standard.</i>		Indicator 9.3.1
<i>Update on development of project plan for carbon sequestration.</i>		Indicator 5.3.1
<i>Update on project plans for future fuel efficiency in tractors identified within CapEx summary.</i>		Indicator 5.1.1
<i>Update on project developments for the following:</i> <ul style="list-style-type: none"> <li>• Improved drainage recommendations,</li> <li>• Dam and water storage mapping,</li> <li>• Stormwater management.</li> </ul>		Indicator 3.2.2



