

# 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.*

<b>Audit Details</b>	
<b>Trading Name</b>	AFF – Australian Food & Fibre
<b>Crop(s)</b> <i>(scope of certification)</i>	Broadacre (Cotton & Grains)
<b>Leading Harvest Program User ID or Membership Number</b>	ACO Certification Number: 13455
<b>Leading Harvest Contact Persons</b>	<ul style="list-style-type: none"> <li>• Amie Turner-Brown (Sustainability Advisor – NRA)</li> <li>• Megan Sloane (Manager Program Oversight &amp; Delivery)</li> <li>• Craig Duncan (Chief People Officer)</li> </ul>
<b>Total Number and Area of Farms Managed</b>	16 farms = 138,274 Ha
<b>Sites Audited</b>	Telleraga Station, Warren Farm, Darling Farms, Koramba Farm.
<b>Auditee Name and Position/Title</b>	
<b>Type and Scope of Audit</b>	Initial onsite certification audit to Leading Harvest Farmland Management Standard 2020 objectives 1–12.
<b>Auditor(s) and Any Accompanying People</b>	Sam Ponder (Lead Auditor)
<b>Audit Dates Onsite</b>	9/05/2023, 10/05/2023, 11/05/2023

# ACO Leading Harvest Audit Report

<p><b>Audit Plan</b></p>	<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></p> <p>The NSW audit commenced at Moree HO with an introduction and discussion with the Moree based senior management and admin team, together with senior AFF and NRA management representatives followed by an inspection of the farming operations around the NSW – Moree, Warren and Bourke. This farm inspection captured field working, planting/spraying/picking activities and the equipment/facilities. 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></p> <p>For AFF farm based operations to-date there were no non-conformances observed – however a number of areas for improvements have been suggested for consideration.</p> <p>Surveillance audits are scheduled for a selection of the farms early 2024 – suggest February/March 2024 prior to busy season.</p>			
<p><b>Site Sampling Requirements</b></p>	<p>AFF manage 16 sites across New South Wales within a centrally controlled management and monitoring system. Audits are conducted via multi-site sampling based on methodology provided within the Leading Harvest Farmland Management System - <i>initial audits shall be a sample of at least 1 x the square root of the total number of similarly-managed sites, re-certification audits at least 0.8 x the square root, and surveillance audits 0.6 x the square root (rounded up). At least 25% of farms sampled must be chosen at random, with the remainder selected based on risk factors such as complaints received, history of non-conformance, larger or more complex farming operations, management changes, local environmental issues or concerns, etc. Additional sites new to the organization shall be audited in addition to those selected by the methodology above).</i></p> <table border="1" data-bbox="508 1556 1490 1709"> <tr> <td data-bbox="508 1556 829 1709"> <p><b>Crops:</b>            Cotton            Wheat            Canola.</p> </td> <td data-bbox="829 1556 1490 1709"> <p><b>Sites audited:</b>            Telleraga Station, Mallowa            Koramba, Boomi            Warren Farm, Warren            Darling Farms, Bourke</p> </td> </tr> </table>		<p><b>Crops:</b>            Cotton            Wheat            Canola.</p>	<p><b>Sites audited:</b>            Telleraga Station, Mallowa            Koramba, Boomi            Warren Farm, Warren            Darling Farms, Bourke</p>
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# ACO Leading Harvest Audit Report

## Executive Summary

### Overall site assessment:

Australian Food & Fibre (AFF) is a vertically integrated grower, processor and marketer of cotton, and is committed to producing the highest quality food and fibre. Their operations are located across New South Wales and have been built on significant industry knowledge, experience and expertise.

AFF's Head Office and Corporate Services team are based in Moree, NSW with their farming operations located across New South Wales

Seasonal production on-farm begins each cotton season with soil preparation during the winter period, followed by planting in early spring. The cotton is irrigated over the summer months, followed by picking season from March to June, and then from there, the cotton moves through to processing and distribution.

AFF maintains industry best practice through being certified to myBMP, a farm and environmental management system for cotton growers to ensure that Australian cotton is produced in a sustainable manner. The programme provides growers and industry access to the latest technical data and research, assists with solutions to challenges and provides practical tools to help growers operate at maximum efficiency. Within myBMP, AFF is audited across the following key areas of farm operation: **Biosecurity, Energy and Input Efficiency, Fibre Quality, Human Resources and Work Health and Safety, Integrated Pest Management, Sustainable Natural Landscape, Pesticide Management, Petrochemical Storage and Handling, Soil Health and Water Management.**

AFF also produces cereals and pulses, including wheat, barley, canola, chickpeas and faba beans. Crop rotations assist in maintaining soil health and managing pests and diseases.

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

### Overall management system assessment:

The management system is 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 and harvest.

Three years of GHG inventory data is available for fuel, electricity, soil inputs, crop residues etc.

# ACO Leading Harvest Audit Report

## Standard Elements

\*C/NC/MNC: Conformance, Non-Conformance, Major Non-Conformance

### 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.*

Leading Harvest Indicator	C/NC/MNC*	Audit result
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# ACO Leading Harvest Audit Report

<p><b>Indicator 1.1.1 Farmland Stewardship Commitment</b>          A written commitment statement and list of goals that describes the sustainable agricultural stewardship of farmland.</p>	<p>C</p>	<p><u>Summary of evidence:</u>          Commitment to the sustainable stewardship of farmland is demonstrated by AFF in its inclusion of Leading Harvest principles in its inductions, training, and policies. An “ESG Roadmap” has been developed, approved by the Board, and is being implemented.</p> <p><u>Observations and Findings:</u>          Verified the following operational aspects:</p> <ul style="list-style-type: none"> <li>- Reviewed the overarching policy for environment and sustainability;</li> <li>- OHS policy;</li> <li>- Noted AFF Chapter document that provides a synopsis of the LH Principles;</li> <li>- All AFF employees have access to SharePoint;</li> <li>- Internal staff sustainability training held;</li> <li>- Spoke with all Farm Managers who were aware of LH principles through HO’s environmental and LH communications (sighted presentation LH Accreditation Meeting for regional &amp; farm managers dated 21/4/23) – however it is suggested that ‘soft’ messaging on LH continue to all office and farm staff /contractors.</li> </ul>
<p><b>Indicator 1.1.2 Farmland Stewardship</b>          Demonstration of the management of major synergies and tradeoffs between the economic, social and environmental dimensions of sustainable agricultural stewardship of farmland while ensuring long-term profitability and sustainability.</p>	<p>C</p>	<p><u>Summary of evidence:</u>          AFF begins its Leading Harvest journey with the existing implementation of the cotton industry’s “myBMP” program, a “<i>best management practice system for growers to improve on-farm production</i>” (<a href="https://www.mybmp.com.au/What_is_different.aspx">https://www.mybmp.com.au/What_is_different.aspx</a>), with particular focus on 10 key areas: biosecurity, energy &amp; input efficiency, product quality, human resources &amp; Workplace Health &amp; Safety, Integrated Pest Management, sustainable landscape management, pesticide management, petrochemical storage &amp; handling, soil health, and water management.</p> <p><u>Observations and Findings:</u></p>

## ACO Leading Harvest Audit Report

		<p>Verified the following operational aspects:</p> <ul style="list-style-type: none"> <li>- Profitability is based on adoption of technology and maintaining low cost production in driving productivity;</li> <li>- Induction training took place for regional &amp; farm managers dated 21/4/23 and also at the Cotton Australia Conference held on the Gold Coast August 2022.</li> </ul>
<p><b>Indicator 1.1.3 Farmland Conservation</b>          Conservation of prime farmland to avoid its conversion to non agricultural uses when conversion would adversely impact regional agriculture.</p>	C	<p><u>Summary of evidence:</u>          AFF affirms its commitment to conserve prime farmland and to prevent conversion to non-agricultural use. Should the need arise to convert farmland, it will come after careful consideration by the General Manager, Farm Manager, and Agronomists, based on productivity, topography and associated issues (e.g. waterlogging), yield history, and operational improvements.</p> <p><u>Observations and Findings:</u>          Verified the following operational aspects:</p> <ul style="list-style-type: none"> <li>- Reviewed program with farm managers - rotating crops to alleviate problem species establishing.</li> </ul>
<p><b>Performance Measure 1.2 Critical External Factors:</b> <i>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.</i></p>		
<b>Leading Harvest Indicator</b>	C/NC/MNC*	<b>Audit result</b>
<p><b>Indicator 1.2.1 Adapting to Critical External Factors</b>          A process for periodically identifying critical external factors and adapting to their impacts to ensure the long-term profitability and sustainability of agricultural production of a farm or farm management unit.</p>	C	<p><u>Summary of evidence:</u>          AFF carries out annual assessments of material risks to the environment, human health, and safety with consideration of external factors; a “Safety &amp; Sustainability Board Committee” has been formed to ensure there is a space for discussion of relevant safety and sustainability concerns. AFF refer to an Environmental Risk Register being provided by July 2023.</p> <p><u>Observations and Findings:</u>          Verified the following operational aspects:</p> <ul style="list-style-type: none"> <li>- Evidence reviewed of ongoing business plans;</li> </ul>

## ACO Leading Harvest Audit Report

		<ul style="list-style-type: none"><li>- Supported by a combination of the CAPEX proposals &amp; OPEX (Operational Expenditure);</li><li>- Reviewed several business plans and CAPEX proposals including purchases of new and more efficient Spray Rigs and Harvesters.</li><li>- Sighted OGP Tax invoice for Hybrid Energy Project.</li></ul>
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## ACO Leading Harvest Audit Report

### 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.*

Leading Harvest Indicator	C/NC/MNC*	Audit result
<b>Indicator 2.1.1 Soil Quality</b> Application of regional agricultural best management practices(e.g., tillage systems, cover cropping, addition of soil amendments) to maintain or enhance soil fertility and physical and biological characteristics of soil.	C	<p><u>Summary of evidence:</u>            AFF certification to myBMP demonstrates application of regional best management practices across key areas of nutrition and soil structure including tillage, cover cropping, and addition of soil amendments. Practices include minimising tillage, minimising and monitoring compaction, monitoring of soil carbon, maintenance of crop residues.</p> <p><u>Observations and Findings:</u>            Verified the following operational aspects:</p> <ul style="list-style-type: none"> <li>- Agronomist interviewed and qualifications reviewed;</li> <li>- The Farm Manager’s interviewed have a combination of many years’ experience (up to 35 years in the region) and extensive experience in Cotton and BMP requirements as well as academic qualifications. All were very knowledgeable about their responsibilities and the cropping program;</li> <li>- Soil nutrition is tested by qualified agricultural service providers under guidance of Agronomists.</li> <li>- Noted MyBMP Certificate.</li> </ul>
<b>Indicator 2.1.2 Soil Health Monitoring</b> Monitoring of soil health characteristics, including nutrients from different sources necessary to maintain or enhance Appropriate nutrient balance and soil health.	C	<p><u>Summary of evidence:</u>            AFF have a team of highly experienced farm managers and agronomists conducting regular soil health monitoring including assessment of soil structure and moisture. Testing conducted by third party accredited labs includes soil carbon, sodicity, salinity and nutrient analysis.</p> <p><u>Observations and Findings:</u>            Verified the following operational aspects:</p>

## ACO Leading Harvest Audit Report

		<ul style="list-style-type: none"> <li>- Reviewed farm budgets/product plans that have been produced for each farm;</li> <li>- Agronomist interviewed and confirmed qualifications;</li> <li>- The Farm Manager's interviewed have a combination of many years' experience (up to 35 years in the region) and extensive experience in Cotton and BMP requirements as well as academic qualifications. All were very knowledgeable about their responsibilities and the cropping program;</li> <li>- Farm management interviewed included regional managers, farm managers and area managers covering all sites inspected with core information provided by COO Production;</li> <li>- Reviewed nutrient plans for crop production, stock inventory lists.</li> </ul>
<p><b>Indicator 2.1.3 Nutrient Management Program</b>          An up-to-date nutrient management program that efficiently uses nutrient inputs and nutrients in the soil and crops to create optimum conditions for crop production and nutrient utilization and avoids nutrient loss to water and air.</p>	<p>C</p>	<p><u>Summary of evidence:</u>          AFF utilise experienced and qualified agronomists and farm managers in the development of a nutrient management budget, crop rotation system and fertiliser plan forming the basis of actions required and outlining source, timing, rate and application areas.</p> <p><u>Observations and Findings:</u>          Verified the following operational aspects:</p> <ul style="list-style-type: none"> <li>- Last Consultant Agronomist Report submitted and sighted;</li> <li>- Examples of farm soil test results reviewed;</li> <li>- All planning is undertaken by AFF senior management team in consultation with consultant agronomists and farm managers.</li> </ul>



## ACO Leading Harvest Audit Report

<p><b>Indicator 2.1.4 Crop Residues</b>          Application of regional agricultural best management practices to use crop residues to maintain or improve soil health and long-term soil productivity where appropriate.</p>	<p>C</p>	<p><u>Summary of evidence:</u>          AFF utilise “no till” or “minimum tillage” stubble management practices with the avoidance of bare fallows with intention to reduce the risk and impact of erosion and promote nutrient recycling, organic carbon, soil microbiome improvements and improvements to water use efficiencies. AFF reference cover cropping practices and justification in instances where stubble burning practices may occur said to be provided July 2023.</p> <p><u>Observations and Findings:</u></p> <ul style="list-style-type: none"> <li>- Verified the following operational aspects:</li> <li>- Crop stubble is mulched in preparation for the following rotation;</li> <li>- Nutrients are added back in pelletized form;</li> <li>- All Farm Managers interviewed were observed to be experienced and familiar with their regions soil profiles;</li> <li>- All farms are Cotton Australia MyBMP certified.</li> </ul>
<p><b>Performance Measure 2.2 Soil Conservation:</b> <i>Standard users shall implement agricultural practices to minimize soil erosion and avoid degradation of agricultural lands.</i></p>		
<p><b>Leading Harvest Indicator</b></p>	<p>C/NC/MNC*</p>	<p><b>Audit result</b></p>
<p><b>Indicator 2.2.1 Cropland Soil Management</b>          Application of regional agricultural best management practices to minimize soil erosion and physical damage (e.g., compaction) of cropland and restore soil health where appropriate.</p>	<p>C</p>	<p><u>Summary of evidence:</u>          AFF demonstrates practices including retention of crop residues, permanent wheel tracks across fields to minimise compaction and field design including laser-levelling to grade for maximum water efficiency.</p> <p><u>Observations and Findings:</u></p> <ul style="list-style-type: none"> <li>- Verified the following operational aspects:</li> <li>- All soil work is undertaken under the guidance of farm management staff and consultant agronomists;</li> <li>- Use of ground cover including the previous years’ stubble is incorporated back into the soil for the next crop rotation;</li> <li>- using row tracking to reduce compaction;</li> <li>- noted irrigation channels are cleaned out as necessary.</li> </ul>

## ACO Leading Harvest Audit Report

<p><b>Indicator 2.2.2 Degradation of Agricultural Lands</b>          A process to avoid the widespread loss of agricultural lands to soil mismanagement (e.g., failure to prevent extensive soil erosion, acidification, salinization and accumulation of other adverse compounds).</p>	<p>C</p>	<p><u>Summary of evidence:</u>          AFF demonstrates practices required by myBMP certification including identification, assessment, recording and action for areas at risk of or impacted by soil erosion. In addition to assessment, maintenance, and improvements to soil structure.</p> <p><u>Observations and Findings:</u>          Verified the following operational aspects:</p> <ul style="list-style-type: none"> <li>- Noted that soil analysis is ongoing as part of the annual nutrient management program of the farms with strategies such as cover cropping, retention of stubble, crop rotations and short fallow periods utilized;</li> <li>- Some degraded land along channel was being encouraged to grow saltbush species with no erosion evident during farm inspections due to ongoing programmed channel cleaning;</li> <li>- Note that all irrigated fields are laser levelled with levy banks and tail water drains.</li> </ul>
<p><b>Objective 3. Water Resources</b>          To protect water resources and manage water for efficient agricultural productivity.</p>		
<p><b>Performance Measure 3.1. Water Use:</b> <i>Standard users shall conserve water resources and manage water use to avoid long-term depletion and maintain crop productivity.</i></p>		
<p><b>Leading Harvest Indicator</b></p>	<p>C/NC/MNC*</p>	<p><b>Audit result</b></p>
<p><b>Indicator 3.1.1 Agricultural Water Withdrawal</b>          A process for avoiding the depletion of available Groundwater resources beyond the recharge capacity of the watershed or catchment and by direct withdrawal where groundwater depletion is an issue as determined by a groundwater regulatory agency.</p>	<p>C</p>	<p><u>Summary of evidence:</u>          AFF hold water licences for water withdrawal and is aware of and complies with license conditions. Water budgets are prepared which take into consideration trends from NSW Water and a network of piezometers measuring depths of aquifers. Water use is metered and records of water use are maintained. Stormwater management plans and reports with credentials of stormwater engineers said to be provided in July 2023.</p> <p><u>Observations and Findings:</u>          Verified the following operational aspects:</p> <ul style="list-style-type: none"> <li>- All irrigated fields are laser levelled with levy banks and tail water drains;</li> </ul>

## ACO Leading Harvest Audit Report

		<ul style="list-style-type: none"> <li>- The season was observed to be well advanced and that by retaining ground cover from the previous year’s crop stubble, moisture too was maintained;</li> <li>- Water is measured against budgets on-farm in real time;</li> <li>- Dryland sowing of grain was observed direct into the stubble;</li> <li>- Irrigated cotton fields were inspected in varying states of preparations with high moisture levels as evidenced from recent rainfall;</li> <li>- Water licenses were sighted – managers have direct online access;</li> <li>- Examples of Water Licenses attached as reference.</li> </ul>
<p><b>Indicator 3.1.2 Regional Water Conservation</b>        Participation individually or collaboratively in regional water conservation programs where appropriate to help foster responsible use and conservation of groundwater and surface water used for agriculture.</p>	C	<p><u>Summary of evidence:</u>        AFF operates within the requirements of legislated water sharing plans (e.g. downflow targets) which are unique to each valley that AFF operates in.</p> <p><u>Observations and Findings:</u>        Verified the following operational aspects:</p> <ul style="list-style-type: none"> <li>- Interviewed Senior Manager – member of regional irrigation association;</li> <li>- Tail water is collected for re-use;</li> <li>- As per 3.1.1.</li> </ul>
<p><b>Indicator 3.1.3. Water Conservation</b>        A water management program that uses appropriate technology (including crop/irrigation system design) and applies regional agricultural best management practices to utilize water efficiently; to provide water tailored to crop needs; and to control pests, pathogens, salinization and accumulation of other adverse compounds.</p>	C	<p><u>Summary of evidence:</u>        AFF demonstrates conservation of water through use of moisture probes to guide optimal irrigation scheduling, irrigation flow rates and cut offs appropriate to soil and crop types, installation of tailwater and stormwater infrastructure for water collection and storage. Design and construction of water storage to minimise evaporation, leaks, and seepage. Contamination minimised using stormwater management systems designed to capture first flush from treated areas.</p> <p><u>Observations and Findings:</u>        Verified the following operational aspects:</p> <ul style="list-style-type: none"> <li>- Rainfall readings are taken from strategically based weather stations on the farms. These</li> </ul>

# ACO Leading Harvest Audit Report

		<p>are recorded and available to all Managers and consultants;</p> <ul style="list-style-type: none"> <li>- Soil moisture is a component of the weather stations recording system and used to assess available plant moisture.</li> </ul>
<p><b>Performance Measure 3.2. Water Quality:</b> <i>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.</i></p>		
<b>Leading Harvest Indicator</b>	<b>C/NC/MNC*</b>	<b>Audit result</b>
<p><b>Indicator 3.2.1 Input Application on Agricultural Lands</b>          Application of regional agricultural best management practices when applying fertilizers and other soil amendments, crop protectants and other agricultural inputs to avoid and control infiltration of nutrients, crop protectants and pathogens into groundwater.</p>	C	<p><u>Summary of evidence:</u>          AFF demonstrates worker training in appropriate use of inputs and input applications managed by qualified consultants and agronomists. Input planning and application noted to consider input selection, weather conditions, equipment and techniques and strategies to prevent off-farm water quality impacts.</p> <p><u>Observations and Findings:</u></p> <ul style="list-style-type: none"> <li>- Verified the following operational aspects:             <ul style="list-style-type: none"> <li>- Minimal till practiced (stubbles maintained) with sowing taking place direct into soil;</li> <li>- Inspected a number of farms where fertiliser/chemical /watering budgets were prepared (examples provided as photo evidence) – also inspected seed that had been planted – some crop was up and had been provided the appropriate amount of fertilizer after a pre-emergent pesticide had been applied as necessary;</li> <li>- Noted use of chemical spraying equipment.</li> </ul> </li> </ul>
<p><b>Indicator 3.2.2 Water Quality Protection</b>          Application of regional agricultural best management practices to manage water runoff from cropland into surface water and protect wetlands, riparian areas and water quality of groundwater and surface water.</p>	C	<p><u>Summary of evidence:</u>          AFF demonstrate management strategies to prevent off-farm water quality impacts from tailwater and storm water including collection of first flush stormwater and containment of tailwater on farm. Irrigation discharge points noted to point away from sensitive areas. AFF notes protection of riparian zones as a high priority.</p> <p><u>Observations and Findings:</u></p>

## ACO Leading Harvest Audit Report

		As detailed in 3.1.1 above and note that rainfall run-off drains into tail water drains for re-use and naturally occurring waterways which are left in their natural state including retention of native species of ground and tree cover where appropriate.
<b>Objective 4. Crop Protection</b>		
To achieve crop protection objectives while protecting people and the environment.		
<b>Performance Measure 4.1. Integrated Pest Management:</b> <i>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.</i>		
<b>Leading Harvest Indicator</b>	<b>C/NC/MNC*</b>	<b>Audit result</b>
<b>Indicator 4.1.1 Pest Monitoring</b> Monitoring of pests to prevent excessive crop loss and economic injury to crop plants.	C	<p><u>Summary of evidence:</u>          AFF demonstrates pest monitoring practices using industry standard techniques including regular monitoring, sampling, identification and recording of pests and beneficials. Industry thresholds for target pests are understood and used to guide management actions.</p> <p><u>Observations and Findings:</u>          Verified the following operational aspects:</p> <ul style="list-style-type: none"> <li>- Crop/pest monitoring and counting is undertaken by the consultant and staff agronomists and farm management/staff;</li> <li>- Any outbreaks are reported together with an activity plan for management to AFF by way of fortnightly agronomy reports;</li> <li>- A work order is raised x product x field – e.g. during farm inspections it was confirmed by the agronomists that there had been an issue with slugs in the area – the particular areas concerned had been treated. All relevant information is recorded including the Work Order and status of the activity;</li> <li>- Noted use of IPM;</li> <li>- Use of pre-planned chemical applications (insecticide as required) that are recommended by the Agronomists.</li> </ul>
<b>Indicator 4.1.2. Crop Protection</b>	C	<p><u>Summary of evidence:</u>          AFF demonstrate implementation of crop protection processes including managing movement and</p>

## ACO Leading Harvest Audit Report

<p>A process for preventing excessive crop loss from pests, crop protectant resistance and buildup and spread of pests</p>		<p>cleanliness of vehicles, machinery, and equipment; employee awareness and reporting of crop disease; Herbicide Resistance Management Strategy; integrated insect and disease management and managing resistance in Bt cotton.</p> <p><u>Observations and Findings:</u>          As detailed in 4.1.1 above</p>
<p><b>Indicator 4.1.3 Pest Control Practices</b>          Prioritization of the use of lowest risk, most selective treatment options to achieve crop protection goals whenever appropriate.</p>	<p>C</p>	<p><u>Summary of evidence:</u>          IPM techniques are implemented across farms and include field and variety selection, strategic planting, seed treatment, weed host management, trap cropping etc. A Pesticide Application Management Plan is implemented including pre-season discussion with agronomists/consultants. Application of herbicides are managed to ensure application to target weeds when most susceptible.</p> <p><u>Observations and Findings:</u>          As detailed in 4.1.1 above;          - All Chemical is stored in a locked chemical shed and all farm employee applicator license details (ChemCert) are maintained. Examples of chemical handling and application certificates sighted for two staff. These are provided as evidence with the full audit report.</p>

## ACO Leading Harvest Audit Report

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

Leading Harvest Indicator	C/NC/MNC*	Audit result
<b>Indicator 4.2.1. Application and Storage of Crop Protectants</b> Application and storage of crop protectants according to label instructions and regulatory requirements and application of practices to protect employees, farm workers, public health, and the environment and avoid drift of crop protectants offsite.	C	<u>Summary of evidence:</u> AFF demonstrate appropriate application and storage of crop protectants through purpose-built chemical storage facilities, maintenance of application records, appropriate permissions, and suitably qualified personnel supervising, handling, and applying pesticides (e.g.ChemCert). Application of pesticides considers appropriate weather conditions, correct application equipment and techniques.  <u>Observations and Findings:</u> Verified the following operational aspects: <ul style="list-style-type: none"> <li>- Inspected farm chemical storage shed and noted tankers, sprayers and mixing tanks;</li> <li>- All relevant SDS's were on hand with staff SmartPhone access direct to SDS's;</li> <li>- All Chemical applicator license details are maintained in online safety management system.</li> </ul>

**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.*

Leading Harvest Indicator	C/NC/MNC*	Audit result
<b>Indicator 5.1.1 Energy Conservation</b> Energy Conservation: Use of technologies and application of regional agricultural best management practices to conserve energy where appropriate.	C	<u>Summary of evidence:</u> AFF demonstrate monitoring of farm energy use and selection of technologies and practices which reduce direct and indirect energy use. Areas of high energy use are identified, and plans implemented for mitigation. Examples include reduction of energy-consuming crop inputs, optimising energy efficiency in tractors and regular maintenance of machinery and equipment.  <u>Observations and Findings:</u> Verified the following operational aspects:



## ACO Leading Harvest Audit Report

		<ul style="list-style-type: none"> <li>- Noted that Contractors provide tractors, and that diesel use is recorded;</li> <li>- Noted that all modelling for CAPEX applications is based on ROI justification;</li> <li>- Inspected use of machinery and equipment used for planting this year's crop;</li> <li>- A list of CAPEX projects is attached to the report as evidence.</li> </ul>
<b>Indicator 5.1.2 Renewable Energy</b> Use of renewable energy technologies and application of regional agricultural best management practices where appropriate.	C	<p><u>Summary of evidence:</u>          AFF demonstrate identification of areas of significant energy use within the operation. A renewable energy project is currently underway. Solar panels are in place to support channel pumps.</p> <p><u>Observations and Findings:</u>          Verified the following operational aspects:</p> <ul style="list-style-type: none"> <li>- Solar panels are in use on weather stations and some farmhouses.</li> </ul>
<b>Performance Measure 5.2 Air Quality:</b> <i>Standard users shall minimize adverse impacts to air quality from agricultural operations.</i>		
<b>Leading Harvest Indicator</b>	C/NC/MNC*	<b>Audit result</b>
<b>Indicator 5.2.1 Air Emissions</b> Use of low-emission technologies when compatible with regional agricultural best management practices.	C	<p><u>Summary of evidence:</u>          AFF demonstrate the implementation of practices and technologies to reduce direct and indirect energy use including installation of new irrigation pumps designed to reduce high suction pressure. CAPEX proposals identified include new energy efficient machinery and machinery uses.</p> <p><u>Observations and Findings:</u>          Verified the following operational aspects:</p> <ul style="list-style-type: none"> <li>- As per 5.1.1 above all tractor cabs are fully enclosed and air-conditioned with most tractors using GIS/GPS guidance systems – observed 'tram tracks' to reduce compaction;</li> <li>- Fuel use records are maintained for all farms with spread sheets sighted;</li> <li>- Chemical is mixed on site using closed system batching units that are either truck mounted with water tanks to optimize refilling resulting in time efficiency gains or direct into aircraft;</li> </ul>



## ACO Leading Harvest Audit Report

		<ul style="list-style-type: none"> <li>- Defoliant applications for the cotton harvest is primarily by air – invoices are attached to the report as evidence.</li> </ul>
<p><b>Indicator 5.2.2 Airborne Dust Control</b>          Application of regional agricultural best management practices to Minimize airborne dust where and when it adversely affects human health and/or the environment.</p>	C	<p><u>Summary of evidence:</u>          AFF have dust mitigation and monitoring processes in place across all gins and sites. Workers stationed in dusty areas are provided with appropriate PPE and have access to Safe Work Instructions. Dust mitigation practices include control of dust from roadways using onsite water carts during problematic times. AFF note Health Monitoring Data to be supplied in July 2023.</p> <p><u>Observations and Findings:</u>          Verified the following operational aspects:</p> <ul style="list-style-type: none"> <li>- Stubble is retained to reduce erosion, maximize moisture retention and minimize dust. Some roads and high traffic areas are gravelled. Also, fields are ‘tram tracked’ to reduce compaction where possible – this was observed during farm inspections.</li> <li>- Consideration to be given to where high traffic areas that are used as multipurpose roads (for staff access and heavy equipment) and weighbridges to either be bituminous or gravelled.</li> </ul>
<p><b>Performance Measure 5.3 Climate-Smart Agriculture:</b> <i>Standard users shall apply the principles of climate-smart agriculture to reduce adverse impacts to the global climate and adapt to climate change.</i></p>		
<b>Leading Harvest Indicator</b>	C/NC/MNC*	<b>Audit result</b>
<p><b>Indicator 5.3.1 Greenhouse Gas Emissions</b>          Application of climate-smart regional agricultural best management practices that minimize greenhouse gas emissions from agricultural operations and farmland and/or sequester</p>	C	<p><u>Summary of evidence:</u>          AFF utilise precision agricultural practices and optimised operations to reduce greenhouse gas emissions. GHG baseline data gathering in progress using external consultant to track energy consumption, GHG emission reductions and removals. GHG assessment report conducted.</p> <p><u>Observations and Findings:</u>          Verified the following operational aspects:</p>

## ACO Leading Harvest Audit Report

<p>greenhouse gases that contribute to climate Change where appropriate. Examples could include, but are not limited to, application of low-emission technologies and practices that reduce use of agricultural inputs or their volatilization, increase carbon sequestration using farmland, and reduce volatilization of greenhouse gases.</p>		<ul style="list-style-type: none"> <li>- Practical examples are included as per 5.1.1 above;</li> <li>- GHG records were reviewed for AFF farms – spreadsheet example included as part of the report attachments.</li> </ul>
<p><b>Indicator 5.3.2 Climate Change Adaptation and Resilience</b>        Application of climate-smart regional agricultural best management practices to adapt to climate change impacts and enhance farm or management unit resilience where appropriate. Examples could include, but are not limited to, use of heat-resistant crop varieties, new crop species, practices that improve soil moisture retention and soil drainage, and training on management of new crop pests.</p>	<p>C</p>	<p><u>Summary of evidence:</u>        AFF utilises crop varieties which have been trialled and genetically modified to increase resilience and resist effects of climate change. Crop insurance is in place covering several climatic impacts. Climate-smart best practice is demonstrated by compliance with recommendations from Cotton Australia and Cotton Seed Distributors.</p> <p><u>Observations and Findings:</u>        Verified the following operational aspects:</p> <ul style="list-style-type: none"> <li>- Practical examples are included as per 5.1.1 above;</li> <li>- All farm management activities are in consultation with senior staff (including COO Production) and agronomists and follow an annual farm plan prepared in advance;</li> <li>- Farm reporting to AFF HO is completed through weekly meetings;</li> <li>- Farm Managers attended regional cotton (CA) events and farm walks in the area;</li> <li>- There were a number of nutrition based research projects that are part of the consultant agronomists remit.</li> </ul>

## ACO Leading Harvest Audit Report

<p><b>Indicator 5.3.3 Preparedness for Severe Climate and Weather Events.</b> Application of climate-smart regional agricultural best management practices to prepare for and mitigate the impact of severe climate and weather events on the agricultural operation.</p>	<p>C</p>	<p><u>Summary of evidence:</u>          AFF utilises technologies for crop monitoring to ensure crops are in optimal health and have agronomists which can respond quickly. Staff able to manage changes when sites are impacted by severe weather events including trainings and emergency action plans. Leadership trainings are provided to staff with a focus on resilience. AFF note climate forecasting tools and emergency preparedness documents to be provided July 2023.</p> <p><u>Observations and Findings:</u>          Verified the following operational aspects:</p> <ul style="list-style-type: none"> <li>- As per 5.1.1 above;</li> <li>- Observed solar powered weather stations in use with observations recorded;</li> <li>- Information is used by agronomy team in determining soil temperatures/moisture and planting dates etc.</li> </ul>
<p><b>Objective 6. Waste and Material Management</b>          To manage waste, agricultural chemicals and other materials from agricultural operations to minimize their adverse impacts to agriculture and the environment.</p>		
<p><b>Performance Measure 6.1 Management of Waste and Other Materials:</b> <i>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.</i></p>		
<p><b>Leading Harvest Indicator</b></p>	<p>C/NC/MNC*</p>	<p><b>Audit result</b></p>
<p><b>Indicator 6.1.1 Waste Disposal</b>          A process for properly handling and disposing of universal, hazardous and solid waste.</p>	<p>C</p>	<p><u>Summary of evidence:</u>          AFF utilise waste management programs for the proper disposal of empty containers and chemicals including ChemClear, Chem Collect and DrumMuster. Waste oil is collected by licenced collectors. Appropriate storage of wastes is demonstrated prior to collection in dedicated storage areas.</p> <p><u>Observations and Findings:</u>          Verified the following operational aspects:</p> <ul style="list-style-type: none"> <li>- drumMUSTER compounds observed to be in use for unused cleaned chemical containers;</li> <li>- waste oil was collected;</li> <li>- used tyres collected and skip bins maintained for general waste collection;</li> </ul>

## ACO Leading Harvest Audit Report

		<ul style="list-style-type: none"> <li>- all relevant staff were trained in chemical application – e.g. certificates/Smart/Chem cards sighted;</li> <li>- chemicals used are based on crop needs and minimizing build-up of resistance (from agronomic advice provide by agronomists) and supplied from local suppliers.</li> </ul>
<p><b>Indicator 6.1.2 Resource Recovery</b>          A process for properly Handling waste to be reused, repurposed or recycled, or converted to energy, where appropriate.</p>	C	<p><u>Summary of evidence:</u>          AFF demonstrates resource recovery efforts in purchasing of farm and machinery inputs utilising recyclable or returnable containers.</p> <p><u>Observations and Findings:</u>          Verified the following operational aspects:</p> <ul style="list-style-type: none"> <li>- chemical storage shed observed to be banded;</li> <li>- specialist truck mounted closed system batching units and water tanks observed during the farm inspections;</li> <li>- As above for 6.1.1.</li> </ul>
<p><b>Indicator 6.1.3 Management of Agricultural Chemicals and Other Materials</b>          Management, use and storage of agricultural chemicals and equipment gases, fluids and fuels according to regulatory requirements and application of practices to manage spills and protect employees, farm labor and the environment.</p>	C	<p><u>Summary of evidence:</u>          AFF utilise dedicated and appropriate storage of agricultural chemicals and other materials including bunding, PPE, spill kits etc. Applicable staff have suitable qualifications and training in handling of chemicals, access to SDS's and access to emergency plans. AFF refer to the Workplace Health and Safety Manual to be provided July 2023.</p> <p><u>Observations and Findings:</u>          Verified the following operational aspects:</p> <ul style="list-style-type: none"> <li>- Chemical storage sheds observed to be banded;</li> <li>- Observed spray rigs in use together with specialist truck mounted closed system batching units and water tanks during the farm inspections in action at various fields being sprayed;</li> <li>- All relevant employees were trained in chemical application – e.g. sighted current ChemCert/SprayChem cards with records of all competencies x employee maintained in online WHS management system;</li> </ul>

## ACO Leading Harvest Audit Report

		<ul style="list-style-type: none"> <li>- SDS's were available using employee SmartPhone access;</li> <li>- NOTE that contractors operate under signed agreements 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 finalization of the work. Contractors have access to all SDS's;</li> <li>- Farm Managers have actual real-time access to all farm activities and times started and finished.</li> </ul>
<p><b>Performance Measure 6.2 Food and Agricultural Waste Resource Recovery:</b> <i>Standard users shall ensure efficient handling and recovery of agricultural products and agricultural waste.</i></p>		
<b>Leading Harvest Indicator</b>	<b>C/NC/MNC*</b>	<b>Audit result</b>
<p><b>Indicator 6.2.1 Food and Agricultural Product Waste</b>          Prevention of excessive loss of food crops and other agricultural products during harvest and on-farm storage.</p>	C	<p><u>Summary of evidence:</u>          AFF demonstrate prevention of crop waste by optimal timing of sowing, utilising measures to ensure an even stand and managing weeds and pests. Adherence to myBMP certification covering fibre quality in key areas of crop management, crop preparation and harvest. A "Cotton wrap-up meeting" is conducted annually, sharing learnings and outcoming, aimed at improvements and minimising crop losses.</p> <p><u>Observations and Findings:</u>          Verified the following operational aspects:</p> <ul style="list-style-type: none"> <li>- Picking times are recommended by contract agronomists in consultation with farm managers;</li> <li>- All cotton picked goes directly to Gins for processing.</li> </ul>
<p><b>Indicator 6.2.2 Resource Recovery of Agricultural Waste</b>          Reuse, repurpose, and/or recycle product or crop residues, manure, other agricultural wastes and/or</p>	C	<p><u>Summary of evidence:</u>          AFF describes minimal product wastes from farm activities. Crop residues are utilised to improve soil health through increased organic matter. Irrigation tailwater is contained on-farm or shared to group water supply scheme. Examples of how contaminated or rejected post-harvest or ginning waste is handled</p>

## ACO Leading Harvest Audit Report

<p>agricultural inputs (e.g., tailwater recovery) where appropriate.</p>		<p>and if resource recovery practices are in place have been requested as an ongoing improvement.</p> <p><u>Observations and Findings:</u></p> <p>Verified the following operational aspects:</p> <ul style="list-style-type: none"> <li>- All stubble residue is mulched and left in the field to be incorporated back into the soil as organic matter.</li> </ul>
<p><b>Objective 7. Conservation of Biodiversity</b>          To manage farmland in a manner that maintains agricultural production while conserving biodiversity where appropriate or legally required.</p>		
<p><b>Performance Measure 7.1 Species Protection:</b> <i>Standard users shall protect threatened and endangered species and viable occurrences of at-risk species.</i></p>		
<p><b>Leading Harvest Indicator</b></p>	<p>C/NC/MNC*</p>	<p><b>Audit result</b></p>
<p><b>Indicator 7.1.1 Threatened and Endangered Species</b>          Protection of threatened and endangered species when they occur on enrolled farmland and management of agricultural operations with consideration of threatened and endangered species in the local watersheds and landscapes of operation.</p>	<p>C</p>	<p><u>Summary of evidence:</u>          AFF demonstrate analysis and assessment of threatened species on farm sites using <i>Atlas of Living Australia</i> and Environment Protection and Biodiversity Conservation Act 1999. Employee requirements regarding native and endangered species noted to be outlined within the Biosecurity and Biodiversity standard. Crop protectant use noted to be managed to protect habitats from contamination. Sensitive sites identified on farm maps. AFF refers to the Biosecurity and Biodiversity standard and T&amp;E species assessments noted to be provided July 2023.</p> <p><u>Observations and Findings:</u></p> <p>Verified the following operational aspects:</p> <ul style="list-style-type: none"> <li>- Approximately 5% of the farms are retained in their natural state with natural occurring flora and native fauna to the region (e.g. Birds such as Emu's and water-fowl, kangaroo's);</li> <li>- There are no known threatened species at this time within a 5 Km radius of the farms.</li> </ul>
<p><b>Indicator 7.1.2 At-Risk Species</b>          Program to locate and protect known viable occurrences of at-risk species on enrolled</p>	<p>C</p>	<p><u>Summary of evidence:</u>          AFF farm map identifies natural resources including riparian vegetation, native vegetation, and wetlands. Procedures in place to protect remnant native vegetation from spray drift.</p>

## ACO Leading Harvest Audit Report

<p>farmland. A protection program may be developed independently or collaboratively and may use easements, conservation land sales, exchanges or other conservation strategies.</p>		<p><b>Observations and Findings:</b>          Verified the following operational aspects:</p> <ul style="list-style-type: none"> <li>- See 7.1.1 above and part of Due Diligence.</li> <li>- Interrogated the Atlas of Living Australia - CSIRO database that collates data from various specialist agencies.</li> </ul>
<p><b>Performance Measure 7.2 Wildlife Habitat Conservation:</b> <i>Standard users shall conserve native habitats, wildlife habitat, natural communities and Ecologically Important Sites on enrolled farmland.</i></p>		
<p><b>Leading Harvest Indicator</b></p>	<p>C/NC/MNC*</p>	<p><b>Audit result</b></p>
<p><b>Indicator 7.2.1 Native Habitats and Natural Communities</b>          Maintenance or conservation of native habitats and natural communities in areas not used for agricultural production.</p>	<p>C</p>	<p><b>Summary of evidence:</b>          AFF demonstrates processes to protect flora, fauna and native habitats, management of environmental weeds and pests and maintenance of riparian zones through adherence to the Biosecurity and Biodiversity Standard and myBMP certification practice requirements. Removal of fallen trees, trees with hollows, rocks and stumps is minimised. Connectivity improvements of native vegetation and stabilisation of riverbanks and waterways noted as underway and maintained.</p> <p><b>Observations and Findings:</b>          Verified the following operational aspects:</p> <ul style="list-style-type: none"> <li>- See 7.1.1 above;</li> <li>- Native habitat is maintained in its natural state – this includes riparian zones along waterways and timber belts.</li> </ul>
<p><b>Indicator 7.2.2 Ecologically Important Sites</b>          Participation individually or collaboratively in plans or programs that manage Ecologically Important Sites in a manner that takes into account their unique qualities.</p>	<p>C</p>	<p><b>Summary of evidence:</b>          AFF demonstrates awareness of corridors, patches, and single trees and how these link across farms. Identification and protection of remnant native vegetation processes in place. Biosecurity and Biodiversity Standard adherence noted to include plans for mitigating risks to sensitive areas and training staff to identify threatened species and ecological communities.</p> <p><b>Observations and Findings:</b></p>



## ACO Leading Harvest Audit Report

		<p>Verified the following operational aspects:</p> <ul style="list-style-type: none"> <li>- See 7.1.1 above;</li> <li>- Nil issues noted during farm inspections.</li> </ul>
<p><b>Indicator 7.2.3 Cropland for Wildlife Habitat</b>          Application of regional agricultural best management practices on cropland to create temporary wildlife habitat where appropriate.          Examples could include, but are not limited to, no-till practices, cover cropping, adding soil amendments made up of organic matter, bird boxes, soil erosion control structures (e.g., grassed waterways), delayed mowing, intercropping, seeding areas with native grassland seed mixes, tailwater recovery ponds managed as wetlands, and water level management of rice fields for waterbirds.</p>	C	<p><u>Summary of evidence:</u>          AFF demonstrates best management of cropping areas in accordance with myBMP certification requirements including soil quality, crop residue retention, water quality and stabilisation of riverbanks noted to create suitable conditions for temporary wildlife habitat.</p> <p><u>Observations and Findings:</u>          Verified the following operational aspects:</p> <ul style="list-style-type: none"> <li>- Observed that fields post-harvest are maintained with stubble. They are fallowed for a period prior to working up for the following years planting or the next season's rotation.</li> </ul>
<p><b>Performance Measure 7.3 Avoided Conversion:</b> <i>Standard users shall avoid conversion of natural forests, other natural communities and Ecologically Important Sites.</i></p>		
<b>Leading Harvest Indicator</b>	C/NC/MNC*	<b>Audit result</b>
<p><b>Indicator 7.3.1 Habitat Conversion</b></p>	C	<p><u>Summary of evidence:</u>          AFF demonstrate a commitment to conservation of natural habitat within the chapter document noted to be communicated to all staff. Current Billabong Preservation Programme underway with local indigenous groups. Set deforestation cut-off date in line with Science Based Target recommendations. AFF note highlighting of the deforestation statement within the quality manual to be provided in July 2023.</p>



## ACO Leading Harvest Audit Report

		<p><u>Suggested additional evidence/improvement/feedback:</u></p> <p>Verified the following operational aspects;</p> <ul style="list-style-type: none"> <li>- There is no land on the farms that has been set aside other than the non-farmed areas which include riparian zones along waterways and naturally timbered tree belts;</li> <li>- No deforestation takes place.</li> </ul>
<p><b>Indicator 7.3.2 Deforestation</b>        Demonstration of commitment to prevent deforestation of natural forest when farming where biome-specific or geography-specific deforestation protocol(s) are in place, by:</p> <p>(a) A written policy to demonstrate the Standard user's commitment to a zero deforestation policy that identifies the regions of application, relevant natural forest types, appropriate deforestation cut-off date(s) in areas with biome-specific or geography-specific deforestation protocols, and</p> <p>(b) Demonstration of due diligence to prevent the acquisition of farmland that was converted from natural forest after an appropriate deforestation cutoff date(s) identified by the Standard user in areas with biome-specific or geography-specific</p>	<p>C</p>	<p><u>Summary of evidence:</u>        AFF have a set deforestation cut-off date in line with Science Based Target recommendations and note a Deforestation Policy in place. Current Billabong Preservation Programme underway with local indigenous groups. AFF note highlighting of the deforestation statement within the quality manual to be provided in July 2023.</p> <p><u>Observations and Findings:</u></p> <p>Verified the following operational aspects;</p> <ul style="list-style-type: none"> <li>- There is no land on the farms that has been set aside other than the non-farmed areas as described above;</li> <li>- No deforestation takes place.</li> </ul>

# ACO Leading Harvest Audit Report

deforestation protocols.		
<b>Performance Measure 7.4 Crop Diversity:</b> <i>Support crop diversity on cropland.</i>		
<b>Leading Harvest Indicator</b>	<b>C/NC/MNC*</b>	<b>Audit result</b>
<b>Indicator 7.4.1 Crop and Genetic Diversity</b> Use of a variety of crop species, crop varieties, companion crops (e.g., cover crops, cross-pollination donors) and/or crop rotation where appropriate.	C	<u>Summary of evidence:</u> AFF demonstrates genetic diversity where possible utilising differing varieties of cotton in consultation with agronomists and farm managers and winter cropping of barley, wheat, Canola and faba beans across AFF sites. Cotton variety field trials are conducted and recorded.  <u>Suggested additional evidences:</u> Verified the following operational mono-cropping aspects for cotton and grains during the farm inspections of Telleraga Station, Koramba, Warren Farm and Darling Farms: <ul style="list-style-type: none"> <li>- Note that there are a number of cotton varieties used for specific conditions;</li> <li>- The respective farm's fields are left in short fallow (season allowing for Bourke) until the following years rotation;</li> <li>- Weeds are managed with a knock down and pre-emergent just prior to sowing, with the stubble cover used to control erosion and provide ground cover and moisture retention. All management is under the guidance of consultant and staff agronomists who report to AFF fortnightly as part of their Agronomy updates.</li> </ul>

# ACO Leading Harvest Audit Report

## 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.*

Leading Harvest Indicator	C/NC/MNC*	Audit result
<b>Indicator 8.1.1 Special Site Identification</b> Use of information such as existing natural heritage data or expert advice in identifying or selecting Special Sites.	NA	<u>Summary of evidence:</u> AFF demonstrates assessments of special sites having been conducted utilising existing heritage databases. Cultural Heritage Standard has been created, implemented and available to all staff through the online WHS management system. Staff are required to stop and alert management upon discovery of suspected culturally significant items or locations. Heritage Standard referred to as evidence has been requested.  <u>Observations and Findings:</u> Verified the following operational aspects; <ul style="list-style-type: none"> <li>- Verbal confirmation from Farm Manager's that to their knowledge no sites had been identified during their time at the respective farms.</li> </ul>
<b>Indicator 8.1.2 Special Site Management</b> Appropriate mapping, cataloguing and management of identified Special Sites in a manner that recognizes their unique qualities	NA	<u>Summary of evidence:</u> AFF Special Sites Standard has been created, implemented and available to all staff through the online WHS management system. Staff are required to stop and alert management upon discovery of suspected culturally significant items or locations. No special sites have been identified to date.  <u>Observations and Findings:</u> Verified the following operational aspects; <ul style="list-style-type: none"> <li>- Confirmed that as per the NRA document review no sites had as yet been identified.</li> </ul>

## ACO Leading Harvest Audit Report

### 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.*

Leading Harvest Indicator	C/NC/MNC*	Audit result
<p><b>Indicator 9.1.1 Economic Contributions</b>            Payment of federal, state and local taxes and, as appropriate, employment of staff from local communities and local procurement of supplies and services.</p>	<p>C</p>	<p><u>Summary of evidence:</u>            Where possible, AFF sources goods and services locally; evidence of a number of Moree-based suppliers has been provided. AFF employs young people, including recent high-school graduates, and those currently studying or recently graduated from university. They are a founding member of the <i>National Farmers Federation AgCareer Start</i> program, which is a 10-12 month “gap-year” program aimed at “<i>kick-starting young Australians’ careers in agriculture</i>”. Examples from applicants to the program have been provided, site placements on farms and gins summarised, noting provision of accommodation; and an article, “<i>From the city to the cotton fields of the bush</i>”, for which an AgCareer Start participant was interviewed. Evidence of provision of work experience to Year 10 high school students from Moree and Narrabri.</p> <p>Description of taxes paid: payroll tax, stamp duty, income tax, Council rates, NSW Water Authority fixed charges.</p> <p><u>Observations and Findings:</u>            Verified the following operational aspects;</p> <ul style="list-style-type: none"> <li>- Discussion with farm manager’s indicated that farm employees were all drawn from the local area and were paid Award rates as per their work category. All employees were paid direct;</li> <li>- Local business houses were used for purchases of farm supplies;</li> <li>- All employee records are maintained in online WHS management system.</li> </ul>

## ACO Leading Harvest Audit Report

<p><b>Performance Measure 9.2 Community Relations:</b> <i>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.</i></p>		
<p><b>Leading Harvest Indicator</b></p> <p><b>Indicator 9.2.1 Community Engagement</b>          Engagement in positive relationships with neighbors and local communities thus raising the awareness of sustainable agriculture.</p>	<p>C/NC/MNC*</p> <p>C</p>	<p><b>Audit result</b></p> <p><u>Summary of evidence:</u>          AFF demonstrate engagement with The Clontarf Foundation and The Stars Foundation, which are active in the provision of mentoring, work experience, employment opportunities, and career pathways for young indigenous women and men. AFF have considerable involvement with local schools and training institutes, and student training is supported by a scholarship and apprenticeship program. AFF is also a sponsor of Ella 7's Rugby Union Tournament, which is the "flagship" Aboriginal and Torres Strait Islander Rugby 7's tournament, as well as other local sporting clubs, especially for youth.</p> <p><u>Observations and Findings:</u>          Verified the following operational aspects;          - Confirmed sponsorships of the local sporting groups through time and donation – see photo attachments to the report;          - Email notifications are sent to employees as part of a Weekly Digest on SharePoint.</p>
<p><b>Performance Measure 9.3 Local Communities and Indigenous Peoples:</b> <i>Standard users shall recognize and respect rights of local communities and the treaty rights of Indigenous Peoples.</i></p>		
<p><b>Leading Harvest Indicator</b></p> <p><b>Indicator 9.3.1 Local Community and Indigenous Peoples Policy</b>          A written policy demonstrating a commitment to recognize and respect the rights of local communities and treaty rights of Indigenous Peoples.</p>	<p>C/NC/MNC*</p> <p>C</p>	<p><b>Audit result</b></p> <p><u>Summary of evidence:</u>          Due Diligence at time of property purchase includes engagement with an external consultant to ensure awareness of special sites, and water, hunting, wild food procurement, and other land access rights. A "Heritage Standard" (including an "SOP for Heritage Places") is said to be in development, and due for completion by AFF by end of July 2023; this will be available to all staff on the WHS Monitor platform upon completion.</p> <p><u>Observations and Findings:</u></p>

## ACO Leading Harvest Audit Report

		<p>Verified the following operational aspects:</p> <ul style="list-style-type: none"> <li>- The STAR'S Foundation &amp; The Clontarf Foundation are established initiatives in Australia supporting young indigenous women and men;</li> <li>- All employees are inducted at commencement using an on-line program that covers: bullying, harassment, anti-discrimination, drugs &amp; alcohol and termination;</li> <li>- Noted the direct employment of staff on the farm is for fulltime residents and purchases are made from local business houses e.g. chemical resellers. Numerous invoices were sighted during the office inspection and Accounts Payable (Moree) interviewed.</li> </ul>
<p><b>Indicator 9.3.2 Land Tenure Rights of Local Communities and Indigenous Peoples</b>        Demonstration of due diligence to prevent infringing on the land tenure rights of local communities and Indigenous Peoples when purchasing and managing land.</p>	<p>C</p>	<p><u>Summary of evidence:</u>        Due diligence is applied at the time of property purchase, in conjunction with an Environmental Sustainability Due Diligence. This is carried out by an external independent consultant to provide insight into existing access rights for local communities and indigenous peoples.</p> <p><u>Observations and Findings:</u>        Verified the following operational aspects;</p> <ul style="list-style-type: none"> <li>- This aspect managed under the Due Diligence for purchase of the farms.</li> </ul>
<p><b>Indicator 9.3.3 Local Communities' and Indigenous Peoples' Inquiries</b>        Demonstration of commitment to be receptive to local communities' and Indigenous Peoples' inquiries and concerns.</p>	<p>C</p>	<p><u>Summary of evidence:</u>        Farm and Gin Managers' contact details are displayed publicly on farm signage, and constitute the first point of call for any enquirers. Informal internal procedures are in place to escalate enquiries through to senior management as required. AFF's general phone number is available on the company website, and calls are directed to the most relevant person. There is also a "Contact Us" page on the website for email enquiries. regular communication is maintained with farm neighbours.</p> <p><u>Observations and Findings:</u>        Verified the following operational aspects;</p>

# ACO Leading Harvest Audit Report

		- Noted that were numerous employees of indigenous heritage working within the staff.
<b>Performance Measure 9.4 Public Health:</b> <i>Standard users shall apply measures to protect public health from adverse impacts of enrolled farmland.</i>		
<b>Leading Harvest Indicator</b>	<b>C/NC/MNC*</b>	<b>Audit result</b>
<b>Indicator 9.4.1 Public Health and Safety</b> Application of health and safety regional agricultural best management practices that protect public health from adverse impacts of agricultural chemicals, excessive nutrients, equipment gases and fluids, fuels and air pollution and that train employees to operate equipment safely.	C	<u>Summary of evidence:</u> AFF's commitment to health and safety has been demonstrated through ongoing certification to the myBMP program. Training is provided to all relevant employees in the safe operation of equipment, and the mitigation of risks associated with storage, handling, application and disposal of agricultural chemicals, fuels, and containers. Safety Data Sheets, SOPs, incidents, and responses are recorded. Operating Procedures and Work Instructions are in place for dealing with chemical spills, applying pesticides, workplace injuries, first aid, and working in isolation. Checks of fire protection equipment and fuel storage containers, and calibration of gas monitoring devices are carried out and records maintained. Employee licenses and certificates for application of chemicals, working at heights, and confined spaces are maintained.
		<u>Observations and Findings:</u> Verified the following operational aspects; <ul style="list-style-type: none"> <li>- Noted Toolbox meetings held;</li> <li>- Sighted farm signage, safety equipment and locked Chemical sheds;</li> <li>- Viewed Spill Kits, bunding and storage systems;</li> <li>- Noted use of Smartphone access to SDS's;</li> <li>- Management confirmed that random drug tests take place;</li> <li>- Spray equipment is calibrated by employees and contractors.</li> </ul>



# ACO Leading Harvest Audit Report

## 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.*

Leading Harvest Indicator	C/NC/MNC*	Audit result
<p><b>Indicator 10.1.1 Equal Opportunity Employment</b>            Provision for equal opportunity employee recruitment and occupations.</p>	<p>C</p>	<p><u>Summary of evidence:</u>            AFF's "Recruitment &amp; Selection Policy" iterates selection practices that are open, competitive, and merit-based, recruitment that is free from direct or indirect discrimination, and for candidates to be chosen based on suitable qualifications and experience.</p> <p>AFF <i>Flexible Working Arrangements</i> include provisions for family &amp; carer responsibility, outside work commitments including community organisations and activities, returning to work after parental leave, and staff aged &gt;55 years, with disability, or pregnant. AFF's <i>Leave Policy</i> includes annual, personal, carer's, compassionate/bereavement, family &amp; domestic violence, community service, long service, parental and purchased leave, leave without pay, and leave in advance.</p> <p><u>Observations and Findings:</u>            Verified the following operational aspects:</p> <ul style="list-style-type: none"> <li>- Interviewed HR Manager and Payroll Manager who confirmed the following;</li> <li>- Every employee undergoes Company induction relating to the above and a medical prior to starting work;</li> <li>- All policies are available on SharePoint under People, Safety &amp; Environment tab;</li> <li>- All Award conditions are available using;</li> <li>- There is a remote loading for regionally based farm employees and overtime is</li> </ul>



## ACO Leading Harvest Audit Report

		<p>available for greater than 76 hours per fortnight;</p> <ul style="list-style-type: none"> <li>- Employees submit timesheets manually using time &amp; attendance system and are paid fortnightly direct into their accounts – advice is by email</li> <li>- All records are maintained in the online WHS management system on the company intranet.</li> </ul>
<p><b>Indicator 10.1.2 Respectful Work Environment</b>          Maintain a safe, gender equitable and professional work environment.</p>	<p>C</p>	<p><u>Summary of evidence:</u>          AFF’s “HR Policy Pack” includes a <i>Code of Conduct</i>, which covers provision of a safe and healthy working environment, strict prohibitions on illegal or threatening behaviour, protection of natural resources, compliance with the Human Rights Act, promotion of diversity and building a positive culture, promoting and improving transparency, honest communication, behaving courteously and ethically, valuing diversity, inclusion, mutual respect, fairness, equality, and positive communication, equal treatment of employees regardless of race, religion, gender, age, origin, sexual orientation, marital status, disability, etc. Incidents and complaints of improper conduct are taken seriously by AFF.</p> <p>Their <i>Workplace Discrimination, Harassment and Bullying Policy</i> requires others be treated with “<i>dignity, courtesy and respect</i>”, that managers model appropriate standards of behaviour, that staff are educated in their obligations under the policy, that issues are resolved fairly and ensure all parties are heard, and that formal complaints be referred to management. Unacceptable behaviour might include unsatisfactory performance or conduct, or serious misconduct; such matters are subject to processes described in AFF’s <i>Performance, Discipline, and Termination Policy</i>, and could lead to formal warnings, termination of employment, or performance coaching. AFF also describes their “<i>Grievance Handling Procedure</i>”, and “<i>Whistleblower Protection Policy</i>”.</p>

# ACO Leading Harvest Audit Report

		<p><b>Observations and Findings:</b></p> <p>Verified the following operational aspects;</p> <ul style="list-style-type: none"> <li>- Policy &amp; Procedures are available through company SharePoint access. Each employee has access to a SmartPhone for Safety information with iPad's available for casual staff;</li> <li>- All training/competencies are maintained in online WHS monitoring system.</li> </ul>
<p><b>Performance Measure 10.2 Occupational Training:</b> <i>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.</i></p>		
<p><b>Leading Harvest Indicator</b></p>	<p>C/NC/MNC*</p>	<p><b>Audit result</b></p>
<p><b>Indicator 10.2.1 Personnel and Contract Worker Training</b>          Health, safety and occupational education and training for Standard user personnel and contract management company employees.</p>	<p>C</p>	<p><b>Summary of evidence:</b>          AFF provided relevant training to all staff, and encourages further education. As a member of myBMP and Cotton Australia, AFF is regularly updated with training events and conferences available for up-skilling of staff. All staff and contractors are required to carry out site inductions, training history is maintained on the online WHS management system, and records are monitored to ensure expiring credentials are renewed. Appropriate training records and licenses are maintained for staff, including first aid certificates and pesticide handling and application certificates.</p> <p><b>Observations and Findings:</b></p> <p>Verified the following operational aspects;</p> <ul style="list-style-type: none"> <li>- All relevant records x training x employee are maintained in online WHS management system;</li> <li>- Interviewed farm management regarding OH&amp;S;</li> <li>- Appropriate safety signage was observed during the farm inspections;</li> <li>- Toolbox meetings are held with attendance lists maintained;</li> <li>- ChemCert/ChemSafe qualifications are maintained for all chemical applicators in online WHS management system;</li> </ul>

## ACO Leading Harvest Audit Report

		- All contractors have signed agreements and are inducted.
<p><b>Performance Measure 10.3 Supporting Capacity for Sustainability:</b> <i>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.</i></p>		
Leading Harvest Indicator	C/NC/MNC*	Audit result
<p><b>Indicator 10.3.1 Sustainability Policy Commitment</b>          Standard users shall provide a written policy demonstrating commitment to the Leading Harvest Standard that is communicated throughout the organization, particularly to facility and farm managers.</p>	C	<p><u>Summary of evidence:</u>          AFF's commitment to sustainability has been demonstrated in its adoption and continued maintenance of myBMP certification; inductions of key employees (Managers, COP, PMO, CFO, Safety Coordinator) have been updated to include Leading Harvest principles. AFF has agreed to finalise their "Environment &amp; Sustainability Policy" by the end of July 2023.</p> <p><u>Observations and Findings:</u>          Verified the following operational aspects;</p> <ul style="list-style-type: none"> <li>- LH induction training for managers;</li> <li>- Confirmed qualifications with consultant agronomist during onsite interview.</li> </ul>
<p><b>Indicator 10.3.2 Employee Roles and Responsibilities for Sustainability</b>          Assignment and understanding of roles and responsibilities for achieving the objectives of the Leading Harvest Standard.</p>	C	<p><u>Summary of evidence:</u>          AFF has appointed a Project Management Officer to oversee AFF's programs and projects, including ESG initiatives. AFF stakeholder has additionally provided the assistance of a suitably-qualified individual (with a Master's in Environment &amp; Sustainability) to assist with the delivery of Leading Harvest. Internal audits are carried out by WHS Coordinators to assess legislative requirements.</p> <p><u>Observations and Findings:</u>          Verified the following operational aspects;</p> <ul style="list-style-type: none"> <li>- LH induction training for managers;</li> <li>- Confirmed qualifications with consultant agronomist during onsite interview;</li> <li>- Example payslip was sighted.</li> </ul>
<p><b>Indicator 10.3.3 Employee Sustainability Training Staff</b></p>	C	<p><u>Summary of evidence:</u>          Sustainability training is provided to staff of AFF via their onboarding process. The "LH AFF Deck"</p>

## ACO Leading Harvest Audit Report

<p>education and training for Standard user personnel and contract management company employees sufficient to fulfill their roles and responsibilities under the Leading Harvest Standard. Examples could include, but are not limited to, postsecondary degrees and professional certificates, in-house training, continuing education programs for managing waste, recycling, crop protectant safety, professional development opportunities, and participation in agriculture-related professional organizations.</p>		<p>(PowerPoint Presentation) has been developed by AFF for training purposes, covering the definition of sustainability, environmental, economic and social aspects of sustainability, how it overlaps with existing myBMP certification, workplace safety, water quality, pesticide management, air quality, waste management, public health, occupational training, and legal compliance.</p> <p><u>Observations and Findings:</u></p> <p>Verified the following operational aspects;</p> <ul style="list-style-type: none"> <li>- All relevant records x training x employee are maintained in online WHS management system;</li> <li>- Induction training for managers held with presentation reviewed;</li> <li>- Confirmed agronomy qualifications for Agronomist;</li> <li>- Farm Managers attend regionally based CA events, farm walks and Field Days etc;</li> <li>- Noted memberships of various NSW Fire Authority for both Farm Manager and Assistant Manager.</li> </ul>
<p><b>Performance Measure 10.4 Compensation:</b> <i>Standard users shall ensure adequate livelihood for employees and contract management company employees to attract and retain a stable workforce.</i></p>		
<p><b>Leading Harvest Indicator</b></p>	<p>C/NC/MNC*</p>	<p><b>Audit result</b></p>
<p><b>Indicator 10.4.1 Wages and Pay</b>          Compensation to ensure a living wage for Standard user personnel and contract management company employees.</p>	<p>C</p>	<p><u>Summary of evidence:</u>          AFF employees are employed under the appropriate industrial instruments, in accordance with the <i>Modern Award Enterprise Agreement National Employment Standards – Fair Work Act 2009</i>. Every employee is provided a Fair Work Information Statement upon commencement; payslips are provided to staff within one work day of payment; upon termination of employment, payments are calculated appropriately and paid on the last day of employment. Computer applications including payroll and HR management software are utilised by AFF.</p> <p><u>Observations and Findings:</u>          Verified the following operational aspects;</p>

# ACO Leading Harvest Audit Report

		<ul style="list-style-type: none"> <li>- Interviewed HR Manager;</li> <li>- All employees are engaged under the terms and conditions contained within the current Awards;</li> <li>- Engaged under Individual Flexibility Arrangements;</li> <li>- Timesheets received (electronically) from every employee, emails payslip info to each employee;</li> <li>- Contractors Agreement is in place;</li> <li>- Labour Hire – time and attendance.</li> </ul>
<p><b>Performance Measure 10.5 Farm Labor:</b> <i>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.</i></p>		
<p><b>Leading Harvest Indicator</b></p>	<p>C/NC/MNC*</p>	<p><b>Audit result</b></p>
<p><b>Indicator 10.5.1 Farm Labor Monitoring Program</b>          A program to monitor farm labor contractors employed By Standard users or Contract Management Companies to ensure compliance with applicable federal, state, and local labor laws, statutes, and regulations by reviewing policies, practices, and training addressing workplace environment, equal opportunity, worker health, safety, and compensation, including living wage and, where appropriate, housing and transportation.</p>	<p>C</p>	<p><u>Summary of evidence:</u>          Contract worker and personnel agreements are similar across the various labour hire providers, whose services are used during peak work times. Standing arrangements are in place that ensure pay rates are in line with expectations, and to ensure relevant Visa eligibility checks are carried out and records maintained. Third-party labour hire is minimal, direct-hire casual employees more common; all are considered employees of AFF, and subject to the same onboarding processes, training, and inductions. AFF has developed a “<i>Contractors and Labour Hire Policy</i>” that ensures legal compliance, and is additionally covered on this point by the myBMP certification module “<i>Human Resources and Work Health &amp; Safety</i>”, which requires appropriate management of contractors, processes in place for employing staff, ensuring wages, conditions, and employee entitlements are provided in accordance with the Australian Fair Work Act 2009, that all workers are treated fairly, and that a process is in place for termination of employment.</p> <p><u>Observations and Findings:</u>          Verified the following operational aspects;</p>

# ACO Leading Harvest Audit Report

		<ul style="list-style-type: none"> <li>- Contractor agreements in place for all farm related activities;</li> <li>- Housing is included for full-time farm based employees.</li> </ul>
<b>Objective 11. Legal and Regulatory Compliance</b> To comply with applicable federal, state and local laws, statutes, and regulations.		
<b>Performance Measure 11.1 Legal Compliance:</b> <i>Standard users shall comply with applicable federal, state and local agricultural and related social and environmental laws, statutes, and regulations.</i>		
<b>Leading Harvest Indicator</b>	<b>C/NC/MNC*</b>	<b>Audit result</b>
<b>Indicator 11.1.1 Access to Compliance Information</b> A process by which personnel have access to information of relevant laws, statutes, and regulations in appropriate locations.	C	<u>Summary of evidence:</u> AFF management and senior staff are suitably qualified and capable to provide education and support all staff, and are kept up-to-date with relevant subscriptions to WH&S mailing lists; important requirement updates are communicated to all staff on tearoom notice boards, or immediately via AFF's online WHS management software. Staff inductions and re-inductions include reference to relevant laws and regulations. Briefings from regulatory bodies are received periodically.
		<u>Observations and Findings:</u> Verified the following operational aspects; <ul style="list-style-type: none"> <li>- Safety Policies prominently displayed on the Staff Noticeboards;</li> <li>- Also use of online message boards available to staff via smartphones for on-farm day-to-day notifications;</li> <li>- Appropriate signage installed and viewed on the entry to and around the farm indicating safety requirements, hazards etc;</li> <li>- SDS's sighted;</li> <li>- Ongoing training is provided through Toolbox meetings. Example photo evidence attached to the report.</li> </ul>
<b>Indicator 11.1.2 Program User Compliance Program</b> A program to achieve compliance with applicable	C	<u>Summary of evidence:</u> AFF's compliance program is characterised by adoption and maintenance of myBMP certification, and by the content of their staff inductions; AFF's



## ACO Leading Harvest Audit Report

<p>federal, state or local laws, statutes, and regulations.</p>		<p>ESG actions and initiatives are described in their “ESG Roadmap”.</p> <p><u>Observations and Findings:</u></p> <p>Verified the following operational aspects;</p> <ul style="list-style-type: none"> <li>- Procedures Manual viewed with induction for all incoming employees – other documents available to staff through SharePoint;</li> <li>- Competency and training records are maintained in online WHS management software for each employee;</li> <li>- All employees are engaged under the terms and conditions contained within the current Awards;</li> <li>- Engaged under Fair Work and Enterprise Agreements.</li> </ul>
<p><b>Indicator 11.1.3 Compliance Commitment</b>          Demonstration of commitment to legal compliance through available regulatory action information.</p>	<p>C</p>	<p><u>Summary of evidence:</u>          AFF’s commitment to regulatory compliance is well demonstrated by their adoption and successful maintenance of myBMP certification; the base level of that certification program ensures all legal obligations are met. AFF holds appropriate permits and licences, and has developed and is implementing an “ESG Roadmap”.</p> <p><u>Observations and Findings:</u></p> <p>Verified the following operational aspects;</p> <ul style="list-style-type: none"> <li>- Viewed Chemical User licenses;</li> <li>- Competency and training records are maintained in online WHS management software for each employee.</li> </ul>
<p><b>Performance Measure 11.2 Legal Compliance Polices:</b> <i>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.</i></p>		
<p><b>Leading Harvest Indicator</b></p>	<p>C/NC/MNC*</p>	<p><b>Audit result</b></p>
<p><b>Indicator 11.2.1 Written Compliance Policy</b>          A written policy demonstrating commitment to comply with social laws, such as those addressing</p>	<p>C</p>	<p><u>Summary of evidence:</u>          AFF has agreed to finalise their “<i>Environment &amp; Sustainability Policy</i>” by the end of July 2023.</p> <p><u>Observations and Findings:</u></p> <p>Verified the following operational aspects;</p>



## ACO Leading Harvest Audit Report

<p>civil rights, equal employment opportunities, anti-discrimination and anti-harassment measures, workers' compensation and living wage, Indigenous Peoples' rights, workers' and communities' right to know, prevailing wages, workers' right to organize, and occupational health and safety.</p>		<ul style="list-style-type: none"> <li>- Farm induction for all incoming employees;</li> <li>- Competency and training records are maintained in online WHS management software for each employee.</li> </ul>
<p><b>Indicator 11.2.2 Consistency with International Labor Organization (ILO) Conventions</b>        Demonstration of commitment to respect the principles concerning fundamental rights set out in the ILO Declaration on Fundamental Principles and Rights at Work.</p>	<p>C</p>	<p><u>Summary of evidence:</u>        AFF policies and guidelines are in alignment with Australian work laws and regulations. Age and VISA checks are carried out as part of their onboarding process, and Australian National Award and employment standards are adhered to. Fair Work information is provided to every employee with their employment contract.</p> <p><u>Observations and Findings:</u>        Verified the following operational aspects;</p> <ul style="list-style-type: none"> <li>- Procedures Manual viewed with farm induction for all incoming employees;</li> <li>- Competency and training records are maintained in online WHS management software for each employee;</li> <li>- All employees are engaged under the terms and conditions contained within the current relevant industrial awards.</li> </ul>
<p><b>Indicator 11.2.3 Consistency with Farmland Tenant Law</b>        Demonstration of commitment to respect the rights of farmland tenants of</p>	<p>NA</p>	<p><u>Summary of evidence:</u>        NA</p> <p><u>Observations and Findings:</u>        Verified the following operational aspects:</p>

## ACO Leading Harvest Audit Report

<p>leased lands with respect to the covenant of quiet enjoyment as determined by national, state and/or local laws, statutes, and regulations.</p>		<ul style="list-style-type: none"> <li>- Confirmed that there are no tenants on leased land.</li> </ul>
<p><b>Objective 12. Management Review and Continual Improvement</b>          To promote continual improvement in the practice of sustainable agriculture by conducting management reviews and monitoring performance.</p>		
<p><b>Performance Measure 12.1 Farm Review and Continual Improvement:</b> <i>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.</i></p>		
Leading Harvest Indicator	C/NC/MNC*	Audit result
<p><b>Indicator 12.1.1 Performance Review</b>          A system to review commitments, programs, procedures and measures of progress; evaluate their effectiveness; and review progress toward achieving goals for employees, contractors, use of agricultural inputs, management of adverse and positive environmental impacts, and agricultural production, including greater resource use efficiency.</p>	<p>C</p>	<p><u>Summary of evidence:</u>          AFF has implemented performance reviews of staff, annual review of inputs and yield targets, internal assurance inspections against Leading Harvest performance measures, and regular reviews of all sites as part of the existing myBMP certification program.</p> <p><u>Observations and Findings:</u></p> <ul style="list-style-type: none"> <li>- Verified the following operational aspects;             <ul style="list-style-type: none"> <li>- Management review is ongoing with meetings held weekly. Information is fed in from the regional and farm management. Minutes are maintained;</li> <li>- Interviews with employees who are in constant contact with consultant agronomist indicated that they produce fortnightly reports for AFF.</li> </ul> </li> </ul>
<p><b>Indicator 12.1.2 Monitoring Performance</b>          A program for collecting, reviewing and reporting information to management regarding progress in achieving Leading Harvest Standard objectives and performance measures.</p>	<p>C</p>	<p><u>Summary of evidence:</u>          AFF has implemented regular Leading Harvest assurance checks, in conjunction with existing regular reviews of all sites as part of the myBMP certification program.</p> <p><u>Observations and Findings:</u></p> <ul style="list-style-type: none"> <li>- Verified the following operational aspects;             <ul style="list-style-type: none"> <li>- Management review is ongoing with meetings held weekly. Information is fed in from the</li> </ul> </li> </ul>

## ACO Leading Harvest Audit Report

		<p>regional and farm management. Minutes are maintained;</p> <ul style="list-style-type: none"> <li>- Interview with consultant agronomist indicated that they produce fortnightly reports for AFF and are in constant (weekly) contact with Farm Managers.</li> </ul>
<p><b>Indicator 12.1.3 Agricultural Innovation</b>          A process for identifying and considering opportunities for achieving improved farming efficiency, deploying improved technologies, and using new markets for underutilized agricultural products, new crops and low-grade agricultural materials (e.g., bioenergy markets).</p>	C	<p><u>Summary of evidence:</u>          AFF's commitment to agricultural innovation has been demonstrated through active participation in Cotton Australia and myBMP programs, through the implementation of precision farming technology (camera sprayers to permit targeted spraying, and GPS tracking to avoid overlapped spraying), through trialling new and innovative technology and seed variety trials. CAPEX projects have included upgraded machinery, increasing on-farm efficiencies and decreasing fuel use.</p> <p><u>Observations and Findings:</u>          Verified the following operational aspects, examples include:</p> <ul style="list-style-type: none"> <li>- List of AFF CAPEX projects sighted.</li> </ul>
<p><b>Indicator 12.1.4 Annual Review and Improvement</b>          An annual review of progress by management and determination of changes and improvements necessary to continually improve agricultural efficiency and farm conformance to the Leading Harvest Standard.</p>	C	<p><u>Summary of evidence:</u>          Annual farm reviews are carried out to assess and implement agronomical improvements, and to continually adapt to climate change. Performance appraisals are carried out annually, Leading Harvest Assurance Assessments are intended to be included in annual internal report, and greenhouse gas assessments have been carried out in 2019, 2020, and 2021.</p> <p><u>Observations and Findings:</u>          Verified the following operational aspects:</p> <ul style="list-style-type: none"> <li>- Management review is ongoing with meetings held weekly. Information is fed in from the regional and farm management. Minutes are maintained.</li> </ul>
<p><b>Performance Measure 12.2 Support for Sustainable Agriculture:</b> <i>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.</i></p>		

## ACO Leading Harvest Audit Report

Leading Harvest Indicator	C/NC/MNC*	Audit result
<p><b>Indicator 12.2.1 Support for Agricultural Research</b>            Participation individually or collaboratively in agricultural research or other science-based programs that improve the knowledge and practice of sustainable agriculture.</p> <p>Examples could include, but are not limited to, test plots for seed or crop trials or new practices; citizen science projects; demonstration days; research or partnerships to address agricultural productivity, water quality, community issues or similar topics that broaden the understanding of the benefits and impacts of sustainable agriculture.</p>	C	<p><u>Summary of evidence:</u>            AFF's support of agricultural research has been demonstrated through the hosting of seed variety trials, and resistance trials in conjunction with Pesticide suppliers and researchers.</p> <p><u>Observations and Findings:</u>            Verified the following operational aspects, examples include:</p> <ul style="list-style-type: none"> <li>- Board Membership of myBMP;</li> <li>- Evening of Cotton event;</li> <li>- AFF is involved in research with Cotton Seed Distributors;</li> <li>- Attendance at relevant regional Field Days;</li> <li>- Research projects on variety trials;</li> <li>- Trails with pesticide suppliers and researchers on resistance.</li> </ul>
<p><b>Objective 13. Tenant-Operated Operations</b>            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 of agricultural inputs and the management of adverse environmental impacts</p>		
<p><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></p>		
Leading Harvest Indicator	C/NC/MNC*	Audit result
<p><b>Indicator 13.1.1 Leased-Land Program</b>            A program to help ensure that farmland management complies with the regional agricultural best management practices and</p>	NA	<p><u>Summary of evidence:</u></p> <p><u>Observations and Findings:</u>            Nil tenants or leased land</p>

## ACO Leading Harvest Audit Report

<p>the Principles and Objectives of the Leading Harvest Standard as determined by a Standard user and farmland tenants.</p>		
<p><b>Indicator 13.1.2 Farmland Tenant Agreements</b>          Written agreements with farmland tenants demonstrating their commitment to applying agricultural practices consistent with regional agricultural best management practices.</p>	<p>NA</p>	<p><u>Summary of evidence:</u></p> <p><u>Observations and Findings:</u>          Nil</p>
<p><b>Indicator 13.1.3 Communicating Leased-Land Objectives</b>          A written statement clearly defining sustainable agriculture goals of the Standard user for leased farmland that is shared with farmland tenants and made available to appropriate stakeholders upon request.</p>	<p>NA</p>	<p><u>Summary of evidence:</u></p> <p><u>Observations and Findings:</u>          Nil</p>
<p><b>Indicator 13.1.4 Farmland Tenant Social Responsibility Commitment</b>          A written statement by farmland tenants demonstrating their commitment to operate safely and responsibly; provide a safe working environment; and comply with applicable federal, state and local laws, statutes, and regulations.</p>	<p>NA</p>	<p><u>Summary of evidence:</u></p> <p><u>Observations and Findings:</u>          Nil</p>

## ACO Leading Harvest Audit Report

<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>		
<b>Leading Harvest Indicator</b>	<b>C/NC/MNC*</b>	<b>Audit result</b>
<p><b>Indicator 13.2.1 Verifiable Monitoring System</b>            Use of a verifiable monitoring system with:</p> <p>13.2.1a A process for monitoring the agricultural practices used by farmland tenants; and</p> <p>13.2.1b A process for evaluating application of agricultural practices by farmland tenants and identifying and communicating areas where farmland tenants can improve their performance and achieve greater consistency with the regional agricultural best.</p>	NA	<p><u>Summary of evidence:</u></p> <p><u>Observations and Findings:</u>            Nil land leased</p>
<p><b>Indicator 13.2.2 Improvement of the Verifiable Monitoring System</b>            A process for using information from the verifiable monitoring system to identify areas of performance improvement for the verifiable monitoring system.</p>	NA	<p><u>Summary of evidence:</u></p> <p><u>Observations and Findings:</u>            Nil</p>

<b>Non-conformances</b> <ul style="list-style-type: none"> <li>• description and evidence at the performance measure level</li> <li>• corrective action plans</li> </ul>	<b>MNC/NC*</b> *MNC Major Non-Conformance, NC Conformance	<b>Standard Element</b>
1.2.1 Adapting to Critical External Factors	Minor	Indicator 1.2.1
2.1.4 Crop Residues	Minor	Indicator 2.1.4
3.1.1 Water Conservation	Minor	Indicator 3.1.1
5.2.2 Airborne Dust Control	Minor	Indicator 5.2.2
5.3.3 Preparedness for Severe Climate & Weather Events	Minor	Indicator 5.3.3
6.1.3 Management of Agricultural Chemicals and Other Materials	Minor	Indicator 6.1.3
7.1.1 Threatened and Endangered Species	Minor	Indicator 7.1.1
7.3.2 Deforestation	Minor	Indicator 7.3.2
9.3.1 Local Community and Indigenous Peoples Policy	Minor	Indicator 9.3.1
11.2.1 Written Compliance Policy	Minor	Indicator 11.2.1
<b>Opportunities for improvement (description and evidence)</b>		<b>Standard Element</b>
Continued messaging of Leading Harvest principles throughout the organisation.		
5.3.1 Greenhouse Gas Emissions		Indicator 5.3.1
6.2.2 Resource Recovery of Agricultural Waste		Indicator 6.2.2
<b>Substituted or modified indicators (description, rationale and evidence)</b>		<b>Standard Element</b>
NA		
<b>Previous non-conformance update (description and evidence)</b>	<b>MNC/NC*</b> *MNC Major Non-Conformance, NC Conformance	<b>Standard Element</b>
NA – initial audit		