

Adelaide, SA

LH AUS FMS CERTIFICATION AUDIT SUMMARY REPORT

14 August, 2024



**AVERUM**<sup>™</sup>



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Certification Date	14 August 2024				
Recertification Due Date	14 August 2027				
Certification ID#	Averum-LHFMS-2024-0017				

### **INTRODUCTION**

This report summarises the results of the certification audit conducted on Renewable Resources Group (RRG) managed production agriculture property. The audit was conducted by Matt Armstrong, Lead Auditor and Jemma Lawrence, Field Auditor for Averum. Matt Armstrong has had experience with Leading Harvest throughout its development and is an assurance provider for multiple sustainability programs. Site visits were provided by Jemma Lawrence, Field Auditor. Jemma Lawrence has had experience with Leading Harvest throughout its pilot program in Australia, and has expertise in sustainable production, various agricultural production systems, and many Australian crop types. The audit process and reports were independently reviewed by Sarah Barrett, who has expertise with the Leading Harvest standard and varied agricultural production systems. All senior members of the audit team hold training certificates in ISO 17021:2015 (Conformity Assessment), 14001:2015 (Environmental Management Systems), and/or IAF MD-1:2018 (Certification of Multiple Sites).

### SCOPE AND OBJECTIVE

In 2024, Averum was engaged by RRG to perform an audit of sustainability performance on 0 – 4,000ha of managed agricultural operations and determine conformance to the principles, objectives, performance measures, and indicators of the Leading Harvest Australian Farmland Management Standard 2023 (LH AUS FMS). LH AUS FMS objectives 1 through 12 were covered during the site visit on the Victorian property. There was no substitution or modification of LH AUS FMS performance measures.

#### **COMPANY INFORMATION**

RRG is an agricultural investment firm that operates production farmland properties. Farm management are responsible for the day-to-day farmland management services for RRG's property.

RRG contracted with Averum to provide a Stage 1 audit (or Readiness Review) for the Manta Farm property in 2023. Results of the readiness review were shared with RRG. During certification audits, the Victorian property was visited, with the farm and regional management hosting auditors and providing guidance on the site. Managers overseeing decision making and standard compliance for sample regions were contacted for evidence requests and interviews. The Manta Farm property is a representative sample of current practices in place and management decision making by RRG. The primary agricultural production on sites is wine grapes.

#### **AUDIT PLAN**

An audit plan was developed and is maintained on file by Averum. An online portal was established for RRG coordinators to upload evidence and documentation securely for auditor review, and evidence was continuously uploaded throughout the audit. An opening meeting was held on 01/05/2024, preceding site visits. Following the meeting, a document review of the provided evidence was conducted by Averum. The field site in Victoria was examined on 08/05/2024. A closing meeting was held on 14/08/2024.

Throughout the audit engagement, information, and communication technology (ICT) was employed for a variety of tasks. An online portal was provided and made available for clients to supply documentation for review, provide feedback on observation and notes, and for multiple levels of audit team reviews and signoffs. Throughout the audit engagement, conference calling technology (including Microsoft Teams, etc.) was leveraged for meeting with audit participants and conducting management interviews, follow-up interviews, and Opening and Closing meetings. As Leading Harvest engagements are geographically decentralised, the use of ICT was deemed not only appropriate, but necessary.

### **Opening Meeting: Conference Call**

01/05/2024

#### **Attendees:**

(RRG) Jordan Isken, Mark Lueth, Louie Puleio

(Audit Team) Matt Armstrong, Jemma Lawrence

#### **Topics:**

- Introductions of participants and their roles: Matt Armstrong
- Introduce audit team: Matt Armstrong
- Status of findings of the previous audits: Matt Armstrong
- Audit plan: Matt Armstrong
- Expectations of program user staff: Matt Armstrong
- Method of reporting: Matt Armstrong

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# **Closing Meeting: Conference Call**

14/08/2024

### **Attendees:**

(RRG) Jordan Isken, Mark Lueth, Louie Puleio

(Audit Team) Matt Armstrong, Jemma Lawrence

### Topics:

- Opening remarks: Matt Armstrong
- Statement of confidentiality: Matt Armstrong
- Closing summary: Matt Armstrong
- Presentation of the audit conclusion: Matt Armstrong
  - o Non-Conformances: 1
  - o Opportunities for Improvement (OFI): 5
  - o Notable Practices: 4
- Report timing and expectations: Matt Armstrong

## **MULTI-SITE REQUIREMENTS**

RRG maintains operations on multiple properties across Australia, however there is only one property enrolled under the LH AUS FMS. Regional and farm managers are responsible for developing corrective action plans regarding LH AUS FMS conformance and reporting them to RRG management. RRG's current review and monitoring process is effective and ongoing.

Field visits and observations are conducted based on a sample of regions each year. Since RRG has enrolled a single property into the LH AUS FMS, sampling is not necessary for the 2024 Audit.

In multi-site audits, sampling methodology is provided in the LH AUS FMS. In accordance with International Accreditation Forum Mandatory Documents (IAF-MD) methodology, all sites are initially selected at random with consideration of any preliminary examinations and then coordinated to ensure representative coverage of the complexity of the portfolio, variance in sizes of properties, environmental issues, geographical dispersion, and logistical feasibility.

Region	Crop	Properties Examined During Engagement
Victoria	Wine Grapes	One (1) site visited during audit  - 0 – 10,000ac (0 – 4,000ha)  - Victoria represents 100% of all enrolled acreage  - Management population: One (1) regional manager, One (1) farm manager  - Sites visited: Manta Farms

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### **AUDIT RESULTS**

Overall, RRG's agricultural operations conform to the objectives of LH AUS FMS. Interviews and document reviews were performed to determine procedural and documentation conformance to the LH AUS FMS. Documentation of practices was continuously supplied throughout the audit upon requested. Field visits were performed on the one enrolled site in Victoria. Visits were prior to pruning, so regular management on crop growth, conservation of biodiversity, soil health, and water management were highlighted. Regional and farm management representatives were present and interviewed to illustrate RRG's conformance and policy implementation. Central office staff with roles that impact LH AUS FMS conformance were interviewed to determine awareness of and support for LH AUS FMS conformance, and to illustrate company practices and procedures not performed by farm managers. RRG's regional and farm manager served as guides and were available throughout the entire engagement, providing logistic support and honoring evidence requests wherever needed.

#### **KEY FINDINGS**

**Previous Non-Conformances: N/A** 

Major Non-Conformances: Zero (0) major non-conformances were identified during the audit.

Minor Non-Conformances: One (1) minor non-conformance was identified during the audit.

- 1. 9.2.1 Community Engagement
  - a. No direct engagement (outside of operations) occurs with the local community or local Indigenous community currently, as the business is still getting established.

**Opportunities for Improvement (OFI)**: Five (5) opportunities for improvement were identified during the audit.

- 1. 4.1.1 Pest Prevention
  - a. Contractors and consultants are expected to come clean (washdown prior to coming on farm), however the process could be further formalised.
- 2. 7.3.2 Deforestation
  - a. The zero-deforestation policy relates to primary forest or natural ecosystems of high conservation value and in areas of high carbon stock. It does not completely ban deforestation of other forest types under the relevant legal approvals.
- 3. 11.2.1 Written Compliance Policy
  - a. Compliance language could be collected from policies into a single written statement or digest.

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- 4. 12.1.4 Annual Review and Improvement
  - a. The annual review process for business is still under development. Continue to monitor development during surveillance audits.
- 5. 12.2.1 Support for Agricultural Research
  - a. Other farms are involved but there is little involvement at Manta Farms as they are still getting established. Continue to monitor development during surveillance audits.

Notable Practices: Four (4) notable practices were identified during the audit.

- 1. 1.1.1 Farmland Stewardship Commitment
  - a. The business partners with the Nature Conservancy on their Sustainable Water Impact Fund (SWIF).
- 2. 7.1.1 Threatened Species
  - a. see 7.2.1 below
- 3. 7.1.2 Endangered Species
  - a. see 7.2.1 below
- 4. 7.2.1 Native Habitats and Natural Communities
  - a. As part of the farm's partnership with the Nature Conservancy, RRG completed a survey of all habitats, potential impact of the planned operations and opportunities for replanting/improving existing habitat. Plantings have been completed as part of the planned habitat improvement program

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Review of Previous Audit Cycle: N/A

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The following are summarised findings, per LH AUS FMS performance measure. Specific non-conformances, opportunities for improvement, and notable practices are described in the Key Findings section of this report.

### Objective 1: Sustainable Agriculture Management

### 1.1 Sustainable Agriculture Stewardship

#### **Conformance Evidence**

- Leading Harvest testimonial
- LH Aus Farm Visit Report (pilot)
- RRG Responsible Investment Policy
- Sustainable Ag Opportunities for Fifth Street
- SWIF Impact Reports 2021 & 2022

#### **Auditor Notes**

- As a function of investment, sustainability underpins all RRG's operations.
- In 2019 RRG became a signatory to the United Nations Principles for Responsible Investment and have partnered with the Nature Conservancy on their Sustainable Water Impact Fund (SWIF) which aims to demonstrate sustainable management of water and soil to achieve better outcomes for the people and environment.
- There is not a formal policy on farmland conservation, however it is not in the ethos of the business to convert out of production farmland.
- Marginal areas are assessed for highest and best use (H&BU) (e.g., ag, biodiversity, or other).
- H&BU is determined based on soil assessments that are completed during due diligence. This property was purchased in a rundown state in late 2020 and significant work has been completed since this date to improve the agricultural production value of the property.

### Result: In Conformance, Notable Practice

#### 1.2 Critical External Factors

#### Conformance Evidence

- Manta Farms monthly reports

#### **Auditor Notes**

- Crop suitability models are completed at due diligence, using climate scenario datasets, to check if crop is suitable for temperature scenario predictions.
- Additionally, water availability modelling is completed to ensure the right mix of water rights that would be required to sustain the planned crop are available.
- Management is assessing the ability to diversify vine types to ensure all crops are not fruiting at one time, and therefore at risk of losing entire harvests.
- Budget processes compare fertiliser costs/rate based on vine growth stage.

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

#### 2.1 Soil Health

#### Conformance Evidence

- Manta Farms agronomist reports
- Soil test results 2023
- Soil test results 2024
- Foliar fertiliser records
- Ground fertiliser records
- Manta Farms monthly reports

#### **Auditor Notes**

- Cover cropping of inter-rows with oats in some sections of the orchard with reseeding scheduled shortly after.
- Considering the installation of under vine sprinklers that would provide moisture for permanent cover crops. Site is currently limited by rainfall and heat during summer periods.
- Wire weed was observed to have naturally grown to cover some interrow across the orchard, providing additional ground cover.
- Soil testing was done in April 2024. Soil tests came back showing high salinity and alkaline pH levels, which are to be expected based on past results.
- Organic Matter (OM) higher than average for Sunraysia (0.5%).
- Petiole testing is performed for nutrient analysis, completed mid-season with the potential to increase to twice yearly as harvest amounts increase.
- Management works with agronomists to plan fertiliser and ameliorate programs for coming seasons and adjusts required based on visit findings.
- Agronomists visit once a month during the growing season.
- Management works with both the internal Manta agronomist and external local agronomist that provides advisory services.
- Tie Up farming system is used to record fertiliser records but will be adopting new system in line with other Manta farms.
- Gypsum applications are planned to move salt out of root zone.
- No pruning has been required to date. A light prune will be completed this year, with prunings to be mulched back onto inter-rows.
- Any leftover grapes from harvest are returned to inter-rows and mulched in.

#### Result: In Conformance

### 2.2 Soil Conservation

#### Conformance Evidence

- Manta Investment Parameters Follow Up Memo
- Manta Farm agronomist reports
- Drainage design plans

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

### **Auditor Notes**

- No issues with erosion noted on the site.
- Cover cropping is in place in inter-rows over winter. Volunteer wire weed is present in some inter-rows over summer.
- Salinity and pH are underlying issues across the property which are being managed with gypsum applications.
- Sub-surface drainage is being installed to assist with waterlogging and salinity issues within production areas.

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### **Objective 3: Water Resources**

#### 3.1 Water Use

#### Conformance Evidence

- Manta Water Meter Readings
- Water use licence
- Manta Farms monthly reports

#### **Auditor Notes**

- Water allocations are from Lower Murray Water.
- Using new MAIT irrigation system, although management is still learning the systems full capabilities, including how to pull water use records out based on volumes and pressures.
- Water takes telemetered on gate into property. Internal meter reads are completed regularly to report takes internally and track against allocation over the season.
- Water use information is also accessible through the LMW portal.
- Monthly farm reports have expected water use (budget) and record actual against this.
- Water budgets are completed prior to irrigation seasons by using historical data (expected ML/ha per block) for varieties, crop stage, temperatures, climate, etc.
- Farm and regional managers work together to determine these numbers. Management calculates a percentage of this for each month, based on expected weather (rainfall, temperature).
- Management reviews water use monthly, and fortnightly later in the season.
- Applications are all recorded in excel spreadsheet.
- No specific water conservation groups that management is aware of.
- Applied under vine compost last season, prunings and cover crops will be incorporated once pruning is completed.
- Water use has increasing over the years as vines mature.
- Management can and have bought more water as required.
- Soil moisture probes recently installed (MAIT). Eight placed around farm in different soil types and varieties which read humidity, ground temperature, and soil moisture.
- Management can turn irrigation on automatically based on soil moisture trigger but will still be ground truthing.
- Weather station is installed on farm, related to Tie Up and will be upgraded with new system.

Result: In Conformance

### 3.2 Water Quality

#### Conformance Evidence

- ChemCert certificates
- E. Coli water test results
- SOP Mixing Chemicals
- Spray records 2024

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### **Objective 3: Water Resources**

#### **Auditor Notes**

- Spraying is all completed internally by ChemCert accredited employees based on recommendations.
- Toolbox talks are held or management talks to lead contractors to defines no go zones.
- Weather conditions, wind, spray rates, etc. are all recorded on spray logs.
- Fertiliser is primarily applied via fertigation (drip) and all applications are now based on soil tests and agronomist recommendations.
- Riparian zones are limited to channel and dam areas.
- Dam is going to be high density polyethylene (HDPE) lined in the future.
- Sub-surface drainage is directed to drainage pits before evaporation storage, a shallow large storage for evaporating excess drainage water.

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### **Objective 4: Crop Protection**

### 4.1 Integrated Pest Management

### **Conformance Evidence**

- Manta Farm Fertility Report
- Pest Control records
- Spray records 2024
- Vineyard Inspections 2024

#### **Auditor Notes**

- All contractors and staff required to be inducted and visitors must all sign in.
- A washdown bay is provided on farm that contractors use when leaving to washdown machinery.
- Biosecurity is covered in online inductions.
- Agronomists use on farm machinery to get round (Kubotas).
- Management expects contractors and consultants to have clean machinery when coming on farm but could be further formalised.
- Internal agronomist and pest scouter do pest and disease inspections.
- Pest scouter comes every fortnight and provides reports on updates and recommendations to control but does not recommend specific products for control. Specific product recommendations are determined through discussions with internal agronomist.
- Pest contractor checks on control method and effectiveness on follow up visits.
- Applications recorded in Tie Up farming system.
- Management prefers chemical control for weeds on farm.
- Management has recently purchased an under-vine slasher for inter-rows.
- Rabbit and bird problems have been observed in the past. Management might need to consider control options this year.
- Cockatoos are a problem in the region but not on the Manta Farm.
- Baiting for rats and mice is done around infrastructure monthly during harvest periods as per Freshcare, and every 3 months outside of harvest periods. Applications are recorded in folder in office.
- Targeted sprays applied, with beneficial sprays applied based on minimising impact to beneficials.
- Baseline applications are applied on disease or pest thresholds.

Result: In Conformance, Opportunity for Improvement (OFI)

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## **4.2 Crop Protectant Management**

#### Conformance Evidence

- ChemCert certificates
- DrumMuster receipt
- ACUP certificates
- Spray records 2024
- SOP Mixing Chemicals

### **Auditor Notes**

- Spraying is all completed internally by ChemCert accredited employees.
- Products are stored in segregated chemical storage on farm.
- Season's products are ordered as required rather than storing all at start of season.

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### Objective 5: Energy Use, Air Quality, and Climate Change

### 5.1 Agricultural Energy Use and Conservation

### **Conformance Evidence**

- Manta Farms solar PV assessment

#### **Auditor Notes**

- Management reviews the cost of power and have changed provider to lower costs.
- Strategic initiatives are in place to review more energy efficiency opportunities.
- Dam and drainage have been priorities to date.
- Solar will be looked at in the future for install on shed.
- Opinions on solar utilisation are based on recommendation from an already completed emissions assessment.

Result: In Conformance

### 5.2 Air Quality

#### **Conformance Evidence**

SOPs efficient machinery use (SOP per machine/job)

#### **Auditor Notes**

- Less fuel-efficient tractors have been replaced with more efficient models.
- Donesafe is used to track services, external mechanic comes on farm and does all servicing.
- SOPs are in place for new machine operations staff.
- Single row rather than three rower machines is used on side of hill where three rowers would be ineffective.
- Management uses traffic management during harvest periods, and situates toilets around farm so contractors are not coming through the farm unnecessarily.
- Dust is not a major issue, as harvests are still small at this stage. Dust suppression sprinklers are installed and there is a water cart for future use.

Result: In Conformance

### 5.3 Climate-Smart Agriculture

#### Conformance Evidence

- Emissions data collection sheet
- Carbon results guide
- drainage design plans

#### **Auditor Notes**

- RRG has completed GHG emission assessments, with using information directly from the farm.
- Actions from findings of GHG emission assessments to be determined.
- Farms are encouraged to source materials and other things that are low emissions.

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### Objective 5: Energy Use, Air Quality, and Climate Change

- Drainage upgrades assist with controlling salinity and waterlogging (95% completed).
- Vine species were chosen for planting due to their suitability for the area and marketability.
- Crop insurance is cost prohibitive.
- Cover crops planted in inter-rows and prunings are mulched back onto inter-rows.
- Drainage improvements assist with preventing flash flooding.
- Emergency and evacuation plans are in place for personnel on farm.
- Maps in all rooms of evacuation points and assembly areas. Emergency procedures are in place for when staff are out on farm.

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

### 6.1 Management of Waste and Other Materials

#### **Conformance Evidence**

- DrumMuster receipts
- Waste invoices

#### **Auditor Notes**

- Skip bins for solid waste are collected on an as-need basis.
- Chemical drums are taken to DrumMuster.
- IBCs are returnable to suppliers.
- Some historical waste was left onsite by previous owner (old infrastructure waste, dripper line). Waste is planned to be disposed of properly as time allows.
- Old polyline had to go to general waste because of metal clamps.
- Management orders in bulk when possible, management plans to increase bulk orders as usage increases.
- Site operators do not have separated recycling currently. During harvest when cardboard is used, recycling will be separated out.
- Oil from maintenance is taken offsite by service mechanic. No old waste chemicals on site. Spill kit located in chemical storages.

Result: In Conformance

### 6.2 Food and Agricultural Waste Resource Recovery

#### Conformance Evidence

- SOPs

#### **Auditor Notes**

- Management focus is on continuing to develop management practices.
- Management trains harvest casuals on correct procedures.
- Surplus grapes are taken off the vine, knocked into inter-row and then mulched in.
- Prunings will be mulched in once applicable (pruning has not been required to date).

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### **Objective 7: Conservation of Biodiversity**

#### 7.1 Species Protection

#### Conformance Evidence

- Native Veg Assessment Fifth Street
- SWIF Impact Reports

#### **Auditor Notes**

 As part of the farm's partnership with the Nature Conservancy, RRG completed a survey of all species present, potential impact of the planned operations and opportunities for replanting/improving existing habitat.

Result: In Conformance, Notable Practice

#### 7.2 Wildlife Habitat Conservation

#### Conformance Evidence

- Revegetation Plan Manta Farm

#### **Auditor Notes**

- As part of the farm's partnership with The Nature Conservancy (TNC), a survey of all species
  present was completed including potential impact of the planned operations and
  opportunities for replanting/improving existing habitat. The vegetation assessments were
  undertaken by Pinion Advisory.
- Native vegetation (no threatened communities) currently exists on the outskirts of the property and is joined to vegetation on the neighbouring council land. Management is currently undertaking infill planting on the property and have received approval to continue this onto the council land.
- The TNC framework agreement partnership has resulted in the development of a plan to create a wildlife corridor around the outskirts of the property.
- Biodiversity habitat improvement areas have had issues with pest incursion. Rabbits have
  eaten some of the planted trees (and some vines have been affected). The trees will be
  replanted, while stage two of the habitat restoration has been delayed until pest control can
  be completed.
- Management has spoken with DPI and pest control company about control and will be looking to engage with neighbours.
- Within the inter-rows of the grapes there is cover cropping to support the increase of organic matter in the soil and beneficials are supported by minimal spraying, and avoiding spraying harsh chemicals that would reduce beneficial numbers.

Result: In Conformance, Notable Practice

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#### 7.3 Avoided Conversion

#### Conformance Evidence

- RRG Deforestation and Land Use Policy

#### **Auditor Notes**

- No clearing is completed on farm.
- Manta has a 'no clearing' policy in addition to RRG's deforestation policy. The TNC framework agreement also covers the conservation value and carbon stock value of the property.
- RRG's deforestation policy has used the cut-off date of 2014, as this is identified in other certifications that require zero deforestation (in industries such as cacao and coffee).
- The zero-deforestation policy relates to primary forest or natural ecosystems of high conservation value and in areas of high carbon stock. It does not completely ban deforestation of other forest types under the relevant legal approvals.
- The due diligence process assesses previous land use and looks at aerial imagery and other tools from 2014 to present day to assess land use change. Secondary regrowth, particularly in areas where there is high regeneration, is a primary concern as well, and is carefully assessed during this review.
- Mallee would not necessarily be assessed under the deforestation policy as it would not be classed as forest, but it would be captured under the TNC framework agreement which captures sites of high conservation value and ensures there is not significant negative impact.
- While there have not been any cases where native grasslands have been a primary concern, these would also be assessed as having high conservation value.
- The policy is unlikely to change to a zero-deforestation policy, as believe the process appropriately protects habitat.
- There is an accountability framework and RRG uses the global forest watch with high conservation value areas and high traffic areas.
- Clearing would be limited to isolated patches of minor habitat value areas within a developed area, rather than clearing areas of higher habitat value (no clearing completed on Manta Farm).

### Result: In Conformance, Opportunity for Improvement (OFI)

### 7.4 Crop Diversity

#### Conformance Evidence

- Manta Map of Varieties

#### **Auditor Notes**

 Eight different varieties are grown for disease control on two different root stocks, for vigour and suitability for different soil types.

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

### **8.1 Site Protection**

### **Conformance Evidence**

- Cultural heritage study

# **Auditor Notes**

- Cultural heritage on sites is assessed during due diligence.
- No sites were identified on the property.

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### **Objective 9: Local Communities**

### 9.1 Economic Wellbeing

#### Conformance Evidence

- Observations from farm visits
- Discussions with staff

#### **Auditor Notes**

- Manta accounts team are responsible for payments.
- Services and materials are mostly found locally; some sourced from overseas where required.
- Employees are hired locally where available; however, the farm requires limited full-time labour.

Result: In Conformance

### 9.2 Community Relations

#### Conformance Evidence

- RRG handbook - matching gifts policy

#### **Auditor Notes**

- Renewable Resources Group are a new organisation in this area and are still getting established in the community.
- Once the farm is producing will be looking at donating to or sponsoring the local footy club which is governed by the donation policy.
- Would also like to look at donating time of employees to help council and community organisations do outreach such as rubbish pickups etc., but this is not yet under a policy or process in the business.
- No engagement is currently undertaken with the local Indigenous community and there are no plans at this point to engage.

**Result: Minor Non-Conformance** 

### 9.3 Local Communities and Indigenous Peoples

#### Conformance Evidence

- RRG Responsible Investment Policy

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#### **Auditor Notes**

- Renewable Resources Group's Responsible Investment Policy and its donations policy refers
  to the relationship between the business and local communities, and in the case of the
  Responsible Investment Policy, the local Indigenous communities.
- Past due diligence picks up any sites or land rights that cover the property enrolled.
- Contact numbers are listed on the farm gate. No complaints or concerns from local communities have been received.

**Result: In Conformance** 

#### 9.4 Public Health

#### Conformance Evidence

- ChemCert certificates
- Employee Induction Booklet
- Labour Hire Induction Booklet
- Contractor Induction Booklet
- Labor Code of Conduct
- Training and Induction Procedure Safety Framework
- SOP Mixing Chemicals

#### **Auditor Notes**

- Spraying is all completed internally with ChemCert accredited employees.
- A weather station and rain gauge are on farm to assess conditions prior to spraying.
- Management is planning to change to a new record keeping system to align with other Manta Farm properties.
- Safety systems are run through Donesafe. No instances of near misses or incidents. Notices on toolboxes explain hazards and other safety aspects.
- Visitors and contractors are required to check in and follow farm safety protocols.

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### **Objective 10: Employees and Farm Labor**

### 10.1 Safe and Respectful Working Environment

#### Conformance Evidence

- Anti Discrimination Policy
- Equal Opportunity Policy
- Probation Policy
- Policy and Procedure Acknowledgement
- RRG Diversity and Inclusion Policy 2020

#### **Auditor Notes**

- RRG and Manta Farms have policies on equal opportunity employment.
- Jobs are advertised through seek or agencies with no restrictions on who can apply. Applicants are assessed based on skill set. Manta's HR officer oversees process.
- Toolbox talks cover all relevant topics. Every three months, staff completes safety assessments on infrastructure areas.
- Toolbox records, SOPs and training registers are all kept in Donesafe.

#### Result: In Conformance

### 10.2 Occupational Training

#### Conformance Evidence

- Employee Induction Booklet
- Labour Hire Induction Booklet
- Contractor Induction Booklet
- Training and Induction Procedure Safety Framework

#### **Auditor Notes**

- SOP trainings are covered in toolbox trainings. When new equipment is received, everyone will be trained on the operation and training records are lodged in Donesafe with all employees' signatures. This is checked off by the farm manager.
- Inductions are completed with all contractors and all contractor employees must sign in at office and be inducted before commencing work.

### Result: In Conformance

#### 10.3 Supporting Capacity for Sustainability

#### **Conformance Evidence**

- Australia Testimonials Leading Harvest
- RRG Responsible Investment Policy
- Training and Induction Procedure Safety Framework

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### **Objective 10: Employees and Farm Labor**

#### **Auditor Notes**

- RRG's Responsible Investment Policy covers their sustainability commitment, as does the partnership with The Nature Conservancy.
- RRG have been engaged with LH for several years now and familiar at a corporate level.
- When rolling LH FMS out to Manta, RRG had discussions with the farm and regional managers who have both been through other certifications.
- The farm and regional managers were walked through the standard and meetings have been held post readiness review to review findings and actions.
- Farm and regional managers ensure LH requirements are met on the on-farm level. Given the small size of the team, it is only communicated to staff on an as needs basis (i.e., day-to-day tasks).

Result: In Conformance

## **10.4 Compensation**

#### Conformance Evidence

- Hort award fairwork
- HR summary doc

#### **Auditor Notes**

- The HR officer is responsible for managing wages and ensuring that salaries are appropriate.
- Contractor wages are monitored in the sign in program, matching attendance on farm to invoices that are sent through for payment.
- The contracts of contractors / farm labour crews must be signed off to ensure they are paid appropriately.

Result: In Conformance

#### 10.5 Farm Labor

#### **Conformance Evidence**

- RRG Labor Code of Conduct

#### **Auditor Notes**

- Management keeps records of payments and FLC policies regarding appropriate working conditions.
- HR officer ensures contracts include appropriate working and living conditions and visa and pay slip checks are completed periodically.

# LH AUS FMS AUDIT SUMMARY REPORT

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

### 11.1 Legal Compliance

#### Conformance Evidence

- Water use licence
- Manta Farms compliance review report

#### **Auditor Notes**

- While there is not a specific written compliance statement, some aspects are written into other policies.
- Compliance information is primarily stored at head office or with the regional manager. If a specific person has responsibility for a certain aspect of the operations (e.g., water management) then they will be given the job tasks for meeting this requirement (e.g., reading meter, providing data and monthly meeting to review).
- SDSs are all stored appropriately with the chemical storage.
- Information or updates that affect farm hands will be communicated through toolboxes and follow up with signage.
- SOPs are available for all machinery processes. Farm manager trains staff on all new machinery.
- The WHS officer and farm manager are responsible for ensuring that all compliance obligations are up to date. SDSs must be updated at least every five years.

Result: In Conformance

#### 11.2 Legal Compliance Policies

#### Conformance Evidence

- Equal Opportunity Policy
- Probation Policy
- Policy and Procedure Acknowledgement
- RRG Deforestation and Land Use Policy
- RRG Diversity and Inclusion Policy 2020
- RRG Handbook: \_Matching Gifts Policy
- RRG Labor Code of Conduct
- RRG Responsible Investment Policy

#### **Auditor Notes**

- Compliance with Australian labour laws is ensured by processes and checked regularly by HR officer. Compliance with Australian labour laws translate to compliance with ILO laws as Australia is a founding member.
- Information or updates that affect farm hands will be communicated through toolboxes and follow up with signage.

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### **Objective 12: Management Review and Continual Improvement**

### 12.1 Farm Review and Continual Improvement

#### Conformance Evidence

- Manta Readiness review follow up table
- Sustainable Ag Opportunities for Fifth Street

#### **Auditor Notes**

- Employees undergo 3-, 6- and 12-month reviews depending on their position. Six-month probation is included in most employee contracts. Annual reviews are provided by managers and raise any issues with employees as go along or in toolboxes if applicable, particularly as small team.
- Information is collated on a day-to-day basis for on farm records such as application records.
- Management primarily relies on word of mouth from other farms regarding emergent technology or improvements. The global footprint of RRG allows for cross regional information.
- Farm and regional managers are going to visit farms in California and the Australian CFO has recently returned from South America.

### Result: In Conformance, Opportunity for Improvement (OFI)

### 12.2 Support for Sustainable Agriculture

#### Conformance Evidence

Discussions with staff

#### **Auditor Notes**

 No direct engagement or trials are underway on the farm. However, engagement occurs by people in the wider business, and farm and regional managers can visit other farms to learn from them.

Result: In Conformance, Opportunity for Improvement (OFI)

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# **CONCLUSIONS**

Results of the audit indicate that RRG has implemented a management system that meets the requirements of and is in conformance with the LH FMS. RRG's enrolled acreage is recommended for certification to the Leading Harvest Farmland Management Standard 2023.

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Summary of Audit Findings								
Program User	Renewable Resou	e Resources Group						
Audit Dates	01/05/2024 – 14/0	i – 14/08/2024						
Non-Conformances Raised		Major			Minor			
(NCR):		0		1				
Follow-Up Visit Needed? Yes No Date(s) 14/08/2024								
Follow-Up Visit Remarks								
N/A								
Team Leader Recommendations								
Corrective Act	tion Plan(s) Accep	ted Yes 🛛 I	No 🗌	N/A 🗌	14/08/2024			
Proceed to/Co	ontinue Certification	on Yes 🛛 I	No 🗌	N/A	14/08/2024			
All NCR Close	d	Yes 🛛 🛚	No 🗌	N/A	14/08/2024			
		Standard(s) A						
Leading Harves	st Farmland Manag	ement Standard	2023 (	Objectives	1 through 12)			
Audit Team Leader		Audit Team Members						
Matt Armstrong			Matt Armstrong, Jemma Lawrence, Linnea Abel					
Scope of Audit								
Management of production farmland on direct operated property.								
Accreditations	Appr	Approval by Leading Harvest to provide certification audits						
Number of Ce	rtificates 1	1						
Certificate Nu	<b>mber</b> Averu	Averum-LHFMS-2024-0017						
Proposed Date Audit Event	e for Next TBD,	TBD, 2025						
Audit Report Distribution	(mlue	Jordan Isken (jisken@renewablegroup.com), Mark Lueth (mlueth@renewablegroup.com), Louie Puleio (louie.puleio@mantafarms.com.au)						