

CORRECTIVE ACTIONS

Reference No:	Consent Condition/ Commitment	Non-compliance Risk Rating	Corrective Action	ProTen/SLR Response	Timing of Actions	
NC-1	A2	An additional office building was observed during the site inspection. The date of construction of the office was not confirmed in this audit. Minimal information has been provided in regard to the office building, including evidence of appropriate construction measures (activation of the CEMP). The office has a small footprint (approximately 90m2); however its installation still varies from the consent.	NC REC 1: ProTen to include the additional unapproved office building in the SSD6882 Modification application.	Council to be consulted as to requirement of DA requirements for the office building	September 2024	
NC-2	A6	In Section 4.4 of the 2021-2022 Annual Review, ProTen self-reports a non-compliance and explains: "The total number of birds recorded for batch 2202 was 3,995,242, which is a 75,242 exceedance of the permitted maximum population. The total number of birds recorded for batch 2204 was 3,969,716, which is a 49,716 exceedance of the permitted maximum population". ProTen continues to be non-compliant with this condition because of the requirements of the relationship with Baiada. (b) Compliant. Population spreadsheets with total shed numbers, daily and total mortalities and sampled weight provided for the IEA were consistent with this. (c) Based on evidence provided, ProTen has remained below the limit of 3.92 million total broilers placed on the first day of a cycle. (d) Section 4.4 of the 2021-2022 Annual Review reports a non-compliance because "Broilers were placed at each PPU intervals of less than 36 hours on 11 occasions during the reporting period". Again, in the 2022-2023 Annual Review reporting period, commencement of re-populating each PPU was under 36 hours. This occurred for the batches 2205, 2206, 2301, 2302, 2303, and 2304.	NC REC 2: ProTen to apply for Modification due to the ongoing non-compliance in the project exceeding production and population limits.	Modification 1 completed and approved	Completed 21.3.2024	

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		<p>(e) Section 4 of the 2022-2023 Annual Review reports a non-compliance because “On five occasions during the reporting period, population of the 5 farms was undertaken in less than 10 days”. This occurred for 5 batches, 2206, 2301, 2302, 2303, and 2304. Placement non-compliances continued across the audit period due to the over-supply.</p> <p>It is understood the non-compliance with Condition A6a, A6d, and A6e continued in 2023 due to supplier need. ProTen were in the process of applying for a Modification at the time of this IEA.</p>				
NC-3	A9	Occupation Certificates provided for the existing Development, also assessed as part of previous IEA reports. However, the new office and Shed 3 at Farm 79 have not been through the same certification process.	<p>NC REC 3:</p> <p>ProTen to engage certifiers and pursue an occupation certificate retrospectively for the complete Shed 3 and new office at the site.</p>	Obtain copy of OC for Shed 7903	September 2024	
NC-4	B16	<p>The Traffic Management Plan is part of the CEMP, which has only been relevant to the development for the re-construction of Shed 3 at Farm 79. The CEMP, including the Traffic Management Plan, were not provided for this IEA. Therefore, this condition is non-compliant because a copy of the TMP was not provided.</p> <p>It should be noted that:</p> <ul style="list-style-type: none"> The previous GHD IEA did not assess the TMP, but instead referred to the 2017 IEA Report. The 2017 Audit Report found this condition to be compliant. Section 4.5 of the OEMP also outlines the traffic measures related to the 	<p>NC REC 4:</p> <p>Update the induction process to require the Drivers Code of Conduct/Driver Inductions to be resigned annually in the online induction system and keep these records easily accessible.</p>	Implement driver code of conduct into the contractor induction process	December 2024	

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		<p>operational phase. At the time of the site inspection these measures were being abided by, including while pick up and clean out stages of operations were being completed. The OEMP also has the Drivers Code of Conduct in Appendix D.</p> <p>ProTen was unable to provide signed copies of the Driver's Code of Conduct to the auditors to show new drivers accessing the site have signed this and been debriefed on the TMP/Table 14 of the OEMP. Therefore, Narrandera is considered non-compliant in terms of the implementation of the TMP.</p>				
NC-5	B27	<p>The project completed the construction phase several years ago. The project is currently in an operational phase.</p> <p>However, the following construction activities occurred inside this audit period:</p> <ul style="list-style-type: none"> -Reconstruction of Shed 3 at Farm 79 (due to the fire incident) <p>No evidence was provided to indicate whether construction occurred inside or outside these hours. While there were no evidence reviewed that would suggest construction would have occurred outside of these hours, this condition is considered non-compliant due to a lack of evidence provided by ProTen.</p>	<p>NC REC 5:</p> <p>Update records-management procedures and include the responsibility across more than one position to ensure sound record-keeping. This should be done in Section 3.2 of the OEMP to clearly outline roles for the development, including the Environmental Representative position described in Condition C15 of the Consent.</p>	Update responsibilities in Management plans to include record keeping across multiple roles, including project management	August 2024	
NC-6	B30	<p>Minimal documentation was provided regarding the construction noise management for Shed 3 of Farm 79 in this audit period. No noise complaints were received by the site in the audit period. Based on site discussions there were no issues</p>	<p>NC REC 5:</p> <p>Update records-management procedures and</p>	Update responsibilities in Management plans to include noise management records	August 2024	

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		related to construction noise for shed 3 and the additional office, however Narrandera provided no documented evidence of reviewing noise management and limits for those activities. This condition has been called non-compliant due to the lack of evidence to support a “compliant” finding. Construction activities have a potential for a greater noise impact.	include the responsibility across more than one position to ensure sound record-keeping. This should be done Section 3.2 of the OEMP to clearly outline roles for the development, including the Environmental Representative position described in Condition C15 of the Consent.	across multiple roles, including project management		
NC-7	B38	<p>EPL 20748 does not have any licensed discharge points and no discharge limits. Based on evidence provided (Annual Review 2021-2022 and Lab results) there have been discharges in the IEA period on the following dates and the grab samples collected exceeding the Nitrogen and Phosphorous limits in Table 13 of the WMP:</p> <p>26/10/2021 (Farm 79) 8/11/2021 (Farm 78) 18/11/2021 (Farm 77)</p> <p>The discharges occurred due to heavy rainfall; however it did not qualify for the exemption in EPL Condition O5.3. Therefore, this is considered non-compliant as water discharged exceeded nitrogen and phosphorous limits in the WMP. Note, the auditors have called the site non-compliant in the Water Management Plan condition on the consent because it relates to ‘implementing measures to prevent material harm’.</p> <p>Based on the information provided, ProTen pumped water out of the sediment dams to</p>	No further recommendations	No further actions	NA	

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		manage water levels and onto the surrounding paddocks which are used for cattle and sheep grazing. ProTen note there was no risk of the water then entering waterways because the closest waterway to the site is 9.5km away.				
NC-8	B45	<p>As shown in the publicly available water monitoring results:</p> <ul style="list-style-type: none"> - Six-monthly surface water monitoring has consistently exceeded the ANZECC Criteria and NSW Water Quality Objectives criteria for Total Nitrogen, Nitrate/Nitrite, and Phosphorous - Piezo 1 registered a 2m reduction in standing Water Level during the March 2023 sampling event and has therefore exceeded the 2m trigger level from baseline average outlined in the WMP. - Standing Water levels for piezo 1 Deep, Piezo 2 Deep, Piezo 3 Deep, and Piezo 6 Deep in September 2023 also did not meet criteria. <p>Results provided included the Lab Analysis Reports for the discharges from Farms 79, 78 and 77 on 26/10/2021, 8/11/2021, and 18/11/2021, respectively. These results exceeded the criteria in the WMP for Nitrogen and Phosphorous. This is a non-compliance. It should be noted that the Aitken Rowe Testing Lab results sheets did not contain results for all perimeters listed in Table 13 – Surface water quality impact assessment criteria and water quality objectives, for example no TSS or Ammonia results were provided.</p> <p>ProTen provided evidence of engaging specialists to update the WMP. ProTen are in the process of finalizing the WMP with updated, site-specific trigger values. However, a Memorandum of the Surface Water Quality Trigger Review by SLR dated 20/4/2023 was provided for this IEA which</p>	No further recommendations	Water management plan updated and accepted by DPHI	No further action. Completed May 2024	

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		<p>justifies the change from ANZECC triggers to site-specific triggers. ProTen have been engaging specialists since January 2023 to do the review into the Water Management Plan. The auditor sighted evidence of the SLR reviewing and updating the OEMP and WMP throughout 2023.</p> <p>As described under Condition B38 findings, three PPUs (Farms 79, 78, and 77) pumped out from the sediment dams with N and P exceedances to the neighboring paddocks in 2021. The Response Plan from Section 9 of the WMP required the results to be reviewed to determine the need for an investigation report however no evidence of timely review was provided. Evidence of missed reporting and exceedances under the WMP, therefore non-compliance.</p> <p>Notifications and investigation reports were provided for the following surface water exceedances:</p> <ul style="list-style-type: none"> • 6 September 2022 at all farms (PPU1 to PPU5) exceeded Total Nitrogen (mg/L), Nitrate/Nitrite as N (mg/L) and Total Phosphorous (mg/L) during the 6-monthly sampling. • 15 March 2023 at all farms (PPU1 to PPU5) exceeded Total Nitrogen (mg/L), Nitrate/Nitrite as N (mg/L) and Total Phosphorous (mg/L) during the 6-monthly sampling. • 23 October 2023 at all farms (PPU1 to PPU5) exceeded Total Nitrogen (mg/L), Nitrate/Nitrite as N (mg/L) and Total Phosphorous (mg/L) during the 6-monthly sampling. • 15 March 2023 pH criteria at Piezo 1 Deep, Piezo 2 Deep Piezo 3 Deep, Piezo 5 Deep and Piezo 6 Deep. For this 				

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		<p>sampling event the DPHI also noted that Piezo 1 Deep measured at 24.4mTOC1, 2m from the baseline average of 26.4mTOC1.</p> <ul style="list-style-type: none"> 23 October 2023 drawdown criteria of +/- 2m at Piezo 1 Deep, Piezo 2 Deep and Piezo 3 Deep (required as part of 6 monthly groundwater level and quality sampling). 				
NC-9	B51	<p>No significant alteration outside of the Development footprint were observed during the site inspection. However, there was an additional office installed in the development area near PPU 4/Farm 78 or Bore 2 (naming derived from EIS OzArk Aboriginal Heritage Impact Assessment Report).</p> <p>ProTen did not provide documents which related to the Due Diligence Code of Practice for the Protection of Aboriginal Objects in the New South Wales (OEH), 2010) prior to the installation of the office.</p> <p>The OzArk Aboriginal Heritage Impact Assessment Report (report prepared as part of the EIS) described their study area as: "The direct impact footprint of the proposed works will be approximately 90ha of this area and includes the access road from the Sturt Highway". It is understood the surveys done for the OzArk report were done in the areas that were to be directly impacted, however survey points also talk to the general area surrounding that plot. The new office is located close to Farm 78 which the OzArk report's the nearest survey was Plate # 4 "PPU 4, residences, and Bore 2".</p> <p>No documents related to the office were provided for this IEA (such as pre-disturbance reports or</p>	No further recommendations	All further developments to be completed in accordance with planning and approval guidelines. ACH survey results to be consulted. Unexpected finds procedures in place	ongoing	

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		pre-clearing surveys). Due to inadequate evidence provided, this condition is considered non-compliant.				
NC-10	C1	<p>CEMP not provided for this IEA, therefore this condition could not be assessed. As no evidence has been provided and some construction activities have occurred this condition is considered non-compliant.</p> <p>The project was in an operational phase for this IEA period. However, construction activities were undertaken in the IEA period. These included the reconstruction of Shed 3 Farm 79 and the addition of a small office near Farm 78 (unclear whether construction occurred in 2018 or at some point during Covid-19 (2021-2022). ProTen could not provide records as evidence of implementing the CEMP during the construction of Shed 3 and the office. DPHI's approval of the CEMP could not be provided by ProTen because copies of these records could not be found, and it is likely they were held by a previous consultant. Therefore, non-compliance for preparation of the CEMP.</p>	<p>NC REC 6:</p> <p>Restore the CEMP and TMP (may need to be requested from previous contractors). Alternatively, update the OEMP to describe the construction activities permitted under the Consent and associated requirements, and update the traffic section.</p>	OEMP to be updated. Traffic management plan to be updated when works are undertaken on front entrance. The OEMP will also be updated to include these changes.	March 2025	
NC-11	C5	<p>Due to:</p> <ul style="list-style-type: none"> - There being exceedances surface water discharge quality parameters under the WMP, - Exceedance in operational population limits, - Failure to report all non-compliances in line with the incident management and reporting procedures (Section 9 OEMP), Narrandera is non-compliant with this condition. 	No further recommendations	Modification of SSD has been undertaken to increase population limit for site. Approved March 2024. Water Management plan updated and approved May 2024. Environmental planner implemented to schedule notification periods, routine inspections and testing and	August 2024	

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				incident notification timelines.		
NC-12	C9	<p>The POEO Act defines material harm as:</p> <p>(1) For the purposes of this Part—</p> <p>(a) Harm to the environment is material of—</p> <p>(i) It involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or</p> <p>(ii) It results in actual or potential loss of property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and</p> <p>(b) Loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.</p> <p>Surface water discharge incidents were not reported until the Annual Review report (discharges on 26/10/2021 at Farm 79, 8/11/2021 Farm 78, and 18/11/2021 Farm 77). These discharges exceeded criteria in the WMP, and therefore had the potential for material harm (147-1 a. i). Therefore, non-compliant. However, note there was no evidence of actual harm to human beings or ecosystems.</p>	No further recommendations	Notification of surface water discharges to be completed at time of occurrence	ongoing	
NC-13	C10	As above, in 2021 there were instances of surface water incidents not being reported until the Annual Review report. Therefore, this condition is considered non-compliant in terms of timely incident investigation reporting process for the surface water discharges on 26/10/2021 (farm 79), 8/11/2021 (Farm 78), and 18/11/2021 (Farm 77).	No further recommendations	Notification of incidents to be completed at time of occurrence in line with notification guidelines		
NC-14	C15	The role requirements for the environmental Representative are not outlined in the OEMP,	NC REC 7:	ProTen to apply to DPHI for approval for	August 2024	

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		under Section 3.2 Roles and Responsibilities. No endorsement for the environmental Representative was provided.	Apply for a new Environmental Representative for Narrandera to the DPHI. Refer also to NC REC 5 to clearly outline roles for the project.	SLR to be accepted as Environmental Representative for ProTen		
NC-15	Section 3	Exceedances of total number of birds on the site reported by ProTen due to over-supply of broilers, Refer to Condition A6 for further discussion of findings	Refer to NC REC 1	Modification of SSD has been undertaken to increase population limit for site. Approved March 2024.	Completed	
NC-16	Section 3	No evidence was provided for the construction activities hours in the audit period for the reconstruction of shed 3 at Farm 79 and the new office building. Due to the lack of evidence to demonstrate compliance with construction hours, non-compliant finding has been included for this condition and Condition B27 of this Consent	Refer to NC REC 5	Online induction records to be provided showing sign in and sign out records confirming work hours and times builders were on site.	August 2024	
NC-17	Section 6.7.5	No further disturbance was observed outside of the property boundary. However, disturbance outside the nominated footprint in the Consent occurred when ProTen installed an additional office opposite Farm 78 for additional space during Covid-19 social distancing restrictions. This building is outside the marked disturbance on the project approval plans. The building is small (approx.. 90m2 footprint) and has a gravel driveway connecting it to the project road network. No records regarding its installation were provided for this IEA. Therefore this is non-compliant. Based on the Biodiversity Assessment Report done as part of Appendix I of the EIS, it is	Refer to NC REC 1			

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		<p>understood it is unlikely biodiversity values were impacted.</p> <p>Refer also to Condition A2.</p>				
NC-18	Section 6.8.4	<p>No further disturbance was observed outside of the property boundary. Disturbance has occurred opposite Farm 78 for the placement of an additional office building. The building is small (approx.. 90m2 footprint for the building and whole area of less than an acre in size) and has a gravel driveway connecting it to the project road network. No records regarding its installation were provided for this IEA. Therefore this is non-compliant.</p> <p>It should be noted, the OzArk Report completed for the EIS described its scope as generally coinciding with the planned footprint in the EIS Figures, however there were no pre-clearance surveys provided for this EIA.</p> <p>Refer also to Condition A2</p>	Refer to NC REC 1	Council to be consulted as to DA requirements for the office building	September 2024	
NC-19	A1.1	<p>Non-compliance with operational limits prior to 28 June 2023, with the accommodation capacity was limited to >1000-3000T accommodation capacity. Exceedances in the total population meant this limit was exceeded. ProTen applied to vary the EPL with the EPA on 24-May-2023 to address the non-compliance with the accommodation limit of 1000-3000 T. the EPL was varied on 28-Jun-2023. Therefore, from 28-June-2023 onwards Narrandera is compliant with the accommodation limit shown here in Condition A1.1.</p>	Refer to NC REC 1	Council to be consulted as to DA requirements for the office building	September 2024	
NC-20	L4.1	<p>Non-compliance for exceeding the total population limit of birds on the site at the start of batch cycles. ProTen has reported exceedances in the total number of birds across the site (five PPUs) in Annual Returns. This is an ongoing non-</p>	Refer to NC REC 2	Modification of SSD has been undertaken to increase population limit for	Completed	

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		compliance due to the numbers of birds transported to the site to be placed being dictated by the supplier/Processor. These non-compliances have also been reported in the Annual Reviews. ProTen has provided the following explanation of the cause: The number of birds placed on farms exceeded 3,920,000 in batch 2202 by 1.9% & in batch 2204 by 1.2%. Due to normally expected mortality, the number of birds on site decreased below 3,920,000 by day 10 in batch 2202 and by Day 5 in batch 2204. The total number of birds placed determined by the Processor. Where hatchability of the eggs incubated exceeds the normal predicted levels, higher number of chicks are hatched and these need to be sent to the farm for animal welfare reasons.		site. Approved March 2024.		
NC-21	O4.1	Narrandera did not leave 36 hours in between re-populating each PPU (also referred to as “placement”) for multiple batches in this audit period. This is non-compliant. ProTen has reported this in Annual Returns and provided the following justification: The time between commencement of placement between PPUs was less than 36 hours on 11 out of 30 placements during the reporting year. Due to Covid, there needed to be more flexibility when the birds were being delivered to the farms. There were no adverse effects or complaints given the large distances between individual farms. We will continue to monitor Placement programs and communicate with the Processor where scheduling may result in non-compliance with the EPL.	Refer to NC REC 2	Modification of SSD has been undertaken to remove this condition. Approved March 2024.	Completed	
NC-22	O5.3	Designed waste water collection system around Farms 77, 78, and 79 discharged on 26/10/2021, 8/11/2021, and 18/11/2021 due to large amounts of rain runoff collected. Discharges in this period did not qualify for the rainfall event exemption.	No further recommendations	Cumulative rainfall that does not qualify as a singular rainfall event will gradually build up levels within	April 2024	

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				<p>the retention dam. As they are designed as an enclosed system, reduction in volume only occurs by process of evaporation. A rainfall event only takes into account the beginning volume of the dam being zero (or empty). Discharges from the dams during successful rainfall over a period of time are required in a controlled manner to prevent failure of the dam walls. ProTen will Investigate the viability of a re-use or filtration system for waste water in the retention dams.</p>		
NC-23	R1.7	Due to submitting the Annual Return via the portal, ProTen could not provide signed copies from the signatories (including A – ProTen Director). Administrative non-compliance.	<p>NC REC 8:</p> <p>Once Annual Returns are submitted via the EPA's submission portal, request signatures on the Certification statement to close out the Annual Return submission and retain signed copies as final copies</p>	<p>The EPL annual returns are submitted electronically, and copies received back through the NSW EPA portal do not have signatures on them. Acknowledgement of submission of annual return from the NSW EPA portal is evidence that they have been certified by the CEO and CFO</p>	Save copies of email receipt from EPA portal showing EPL has been submitted	

IMPROVEMENT RECOMMENDATIONS

Aspect	Condition Reference	Improvement REC Number	Recommendation	ProTen/SLR Response	Timing of Actions	Progress
Biodiversity Management Plan	B12	IMP REC 1	Update the BMP along with the OEMP updates to ensure it is a current, practical document.	Plans being reviewed as part of post modification requirements	August 2024	
Dangerous Goods	B22	IMP REC 2	Review the pick-up frequency for empty chemical (including sanitizer) containers to prevent a large number of empty containers being stored at the Farms or sitting on the ground outside of allocated storage areas (sheds).	Clean up and remove empty chemical drums from site at the end of each batch. Add to risk planner	September 2024	
Operational Noise	B32	IMP REC 3	Outline in the OEMP that noise monitoring would be triggered in the event of a noise complaint regarding the project or as directed by the DPHI or EPA. Alternatively, conduct routine (annual) noise monitoring to demonstrate the site is complying with those noise limits in the consent. This will also act to assess compliance against EPL condition L3.1.	Update OEMP to detail that noise monitoring will occur in the event of a complaint	August 2024	
Greenhouse Gas	B48	IMP REC 4	Update Table 23 of the EMP with current energy efficiency measures at Narrandera (e.g. solar power).	Review feasibility of updated Table 23	December 2024	
Aboriginal Heritage	B52	IMP REC 5	Contact the L&DLALC in regards to the fallen limb within the scarred tree exclusion area for further advise.	Contact to be made with L&DLALC regarding the fallen tree limb	September 2024	
Operational Environmental Management Plan	C4	IMP REC 6	Update the OEMP to include the current version of the EPL and all current water licenses (WALs), as well as the most recent consultation received from the agencies consulted in Table 2 (no comments are recorded from a number of the agencies). Ensure	Updates being made to OEMP as required following Modification 1 of SSD	August 2024	

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			this latest version of the OEMP is uploaded to the ProTen website to satisfy Condition C14.			
Management Plan Requirements	C6	IMP REC 7	Incorporate Management Plan review triggers into project requirements such as Annual Review report preparation ir following non-compliance reporting. Ensure Management Plans are written in a manner that does not require the Management Plan to be continually updated with details and then sent for approval.	Incorporate into Management plans as part of post modification update requirements	August 2024	
Annual Reviews	C8	IMP REC 8	Describe proposed improvements under the relevant environmental topic in Section 6 and Section 7 (Water) to clearly link areas of concern or incidents to improve responses and for consistency with Section 6 of the Annual Review Guideline (DPE, October 2015).	Develop spreadsheet to track reporting, investigation and management plan review timelines following triggers – annual reviews, Independent audits, incidents, modifications	September 2024	
Complaints	C14	IMP REC 9	Upload the complaints register Annually with the date to communicate Narrandera has had no complaints.	Monthly update of the complaints register on the ProTen website to be scheduled in Environmental Risk Planner	September 2024	
Waste	O5.1	IMP REC 10	Review the effective maximum capacity of chillers at each PPU to ensure site can practically store approx. 1% of each PPU population for the short term.	Review mortality capacity of chillers	September 2024	