

Re-Accreditation Audit for

Veolia Water Canada Inc. for the Municipality of Brockton

CMPY-165233

130 Wallace St, Walkerton, Ontario, CAN, N0G 2V0

Start Date: Mar 21, 2024 End Date: Mar 22, 2024

Type of audit - On-site/Partial Remote Verification Audit

Issue Date: Mar 22, 2024

Revision Level: Final



#### **BACKGROUND INFORMATION**

Intertek - SAI Global conducted an audit of Veolia Water Canada Inc. for the Municipality of Brockton beginning on Mar 21, 2024 and ending on Mar 22, 2024 to DRINKING WATER QUALITY MANAGEMENT STANDARD VERSION 2 - 2017.

The purpose of this audit report is to summarise the degree of compliance with relevant criteria, as defined on the cover page of this report, based on the evidence obtained during the audit of your organization. This audit report considers your organization's policies, objectives, and continual improvement processes. Comments may include how suitable the objectives selected by your organization appear to be in regard to maintaining customer satisfaction levels and providing other benefits with respect to policy and other external and internal needs. We may also comment regarding the measurable progress you have made in reaching these targets for improvement.

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In addition to the information contained in this audit report, Intertek - SAI Global maintains files for each client. These files contain details of organization size and personnel as well as evidence collected during preliminary and subsequent audit activities (Documentation Review and Scope) relevant to the application for initial and continuing certification of your organization.

Please take care to advise us of any change that may affect the application/certification or may assist us to keep your contact information up to date, as required by Intertek - SAI Global Terms and Conditions.

This report has been prepared by Intertek - SAI Global Limited (Intertek - SAI Global) in respect of a Client's application for assessment by Intertek - SAI Global. The purpose of the report is to comment upon evidence of the Client's compliance with the standards or other criteria specified. The content of this report applies only to matters, which were evident to Intertek - SAI Global at the time of the audit, based on sampling of evidence provided and within the audit scope. Intertek - SAI Global does not warrant or otherwise comment upon the suitability of the contents of the report or the certificate for any particular purpose or use. Intertek - SAI Global accepts no liability whatsoever for consequences to, or actions taken by, third parties as a result of or in reliance upon information contained in this report or certificate.

Please note that this report is subject to independent review and approval. Should changes to the outcomes of this report be necessary as a result of the review, a revised report will be issued and will supersede this report.

Standard: DRINKING WATER QUALITY MANAGEMENT STANDARD VERSION 2 - 2017

Scope of Certification: Full Scope – Entire DWQMS

Drinking Water System Owner: The Municipality of Brockton

Operating Authority: Veolia Water Canada Inc.

Population Serviced: 5699

**Drinking Water Systems** 

Activities: Treatment and Distribution

Chepstow Drinking Water System (Licence No. 081-101)

Lake Rosalind Drinking Water System (Licence No. 081-102)

Walkerton Drinking Water System (Licence No. 081-103)

Total audit duration: Person: 1 Days: 1.50 (1.00 On-site, 0.50 Remote)

Audit Team Member: Team Leader Paul Cartlidge

#### Definitions and action required with respect to audit findings

#### Major Non-conformance:

Based on objective evidence, the absence of, or a significant failure to implement and/or maintain conformance to requirements of the applicable standard. Such issues may raise significant doubt as to the capability of the management system to achieve its intended outputs (i.e. the absence of or failure to implement a complete Management System clause of the standard); or

A situation which would on the basis of available objective evidence, raise significant doubt as to the capability of the Management System to achieve the stated policy and objectives of the customer.

NOTE: The "applicable Standard" is the Standard which Intertek - SAI Global are issuing certification against, and may be a Product Standard, a management system Standard, a food safety Standard or another set of documented criteria.

Action required: This category of findings requires Intertek - SAI Global to issue a formal NCR; to receive and approve client's proposed correction and corrective action plans; and formally verify the effective implementation of planned activities. Correction and corrective action plan should be submitted to Intertek - SAI Global prior to commencement of follow-up activities as required. Follow-up action by Intertek - SAI Global must 'close out' the NCR or reduce it to a lesser category within 90 days for initial certification and within 60 days for surveillance or re-certification audits, from the last day of the audit.

If significant risk issues (e.g. safety, environmental, food safety, product legality/quality, etc.) are detected during an audit these shall be reported immediately to the Client and more immediate or instant correction shall be requested. If this is not agreed and cannot be resolved to the satisfaction of Intertek - SAI Global, immediate suspension shall be recommended.

In the case of initial certification, failure to close out NCR within the time limits means that the Certification Audit may be repeated.

If significant risk issues (e.g. safety, environmental, food safety, product legality/quality, etc.) are detected during an audit these shall be reported immediately to the Client and more immediate or instant correction shall be requested. If this is not agreed and cannot be resolved to the satisfaction of Intertek - SAI Global, immediate suspension shall be recommended.

In the case of an already certified client, failure to close out NCR within the time limits means that suspension proceedings may be instituted by Intertek - SAI Global.

Follow-up activities incur additional charges.

#### Minor Non-conformance:

Represents either a management system weakness or minor issue that could lead to a major nonconformance if not addressed. Each minor NC should be considered for potential improvement and to further investigate any system weaknesses for possible inclusion in the corrective action program

Action required: This category of findings requires Intertek - SAI Global to issue a formal NCR; to receive and approve client's proposed correction and corrective action plans; and formally verify the effective implementation of planned activities at the next scheduled audit.

#### **Opportunity for Improvement:**

A documented statement, which may identify areas for improvement however shall not make specific recommendation(s).

Action required: Client may develop and implement solutions in order to add value to operations and management systems. Intertek - SAI Global is not required to follow-up on this category of audit finding.

## **Audit Type and Purpose**

## **On-site Verification Audit:**

An onsite audit to assess whether a QMS has been implemented for the subject system that meets the "DO" requirements of the DWQMS V2. Some record review was performed remotely using the Google Meet platform.

## **Audit Objectives**

The objective of the audit was to determine whether the drinking water Quality Management System (QMS) of the subject system conforms to the requirements of the Ontario Ministry of the Environment & Climate Change (MOECC) Drinking Water Quality Management Standard (DWQMS V2).

The audit was also intended to gather the information necessary for Intertek - SAI Global to assess whether accreditation can continue or be offered or to the operating authority.

## **Audit Scope**

The facilities and processes associated with the operating authority's QMS were objectively evaluated to obtain audit evidence and to determine a) whether the quality management activities and related results conform with DWQMS V2 requirements, and b) if they have been effectively implemented and/or maintained.

#### **Audit Criteria:**

- The Drinking Water Quality Management Standard Version 2
- Current QMS manuals, procedures and records implemented by the Operating Authority
- Intertek SAI Global Accreditation Program Handbook

## **Confidentiality and Documentation Requirements**

The Intertek - SAI Global stores their records and reports to ensure their preservation and confidentiality. Unless required by law, the Intertek - SAI Global will not disclose audit records to a third party without prior written consent of the applicant. The only exception will be that the Intertek - SAI Global will provide audit and corrective action reports to the Ontario Ministry of the Environment. For more information, please refer to the Intertek - SAI Global Accreditation Program Handbook.

As part of the Intertek - SAI Global Terms, it is necessary for you to notify Intertek - SAI Global of any changes to your Quality Management System that you believe are significant enough to risk non-conformity with DWQMS V2: For more information, please refer to the Intertek - SAI Global Accreditation Program Handbook.

## Review of any changes

Changes to the company since last audit include: none identified

#### **EXECUTIVE OVERVIEW**

Based on the results of this onsite verification audit and the results of the System audit, it has been determined that the management system is effectively implemented and meets the requirements of the standard relative to the scope of certification identified in this report; therefore, a recommendation for certification will be submitted to Intertek - SAI Global review team.

#### Recommendation

Based on the results of this audit it has been determined that the management system is effectively implemented and maintained and meets the requirements of the standard relative to the scope of certification identified in this report; therefore, a recommendation for continued certification will be submitted to Intertek - SAI Global review team.

## **Opportunities for Improvement:**

The following opportunities for improvement have been identified.

- Element 13 Consider adding requirements for calibration service providers to include qualifications
- Element 17 Consider creating a record for handheld pH meter calibration prior to use It is suggested that the opportunities for improvement be considered by management to further enhance the company's Quality Management System and performance.

## **Management System Documentation**

The management systems operational plan was reviewed and found to be in conformance with the requirements of the standard.

#### **Management Review**

Records of the most recent management review meetings were verified and found to meet the requirements of the standard. All inputs were reflected in the records, and appear suitably managed as reflected by resulting actions and decisions.

### **Internal Audits**

Internal audits are being conducted at planned intervals to ensure conformance to planned arrangements, the requirements of the standard and the established management system.

## **Corrective, Preventive Action & Continual Improvement Processes**

The company is implementing an effective process for the continual improvement of the management system through the use of the quality policy, quality objectives, audit results, data analysis, the appropriate management of corrective and preventive actions and management review.

## **Summary of Findings**

1. Quality Management System Conforms		
2. Quality Management System Policy Cor		Conforms
3. Commitment and Endorsement		Conforms
4. Quality M	anagement System Representative	Conforms
5. Documen	t and Records Control	Conforms
6. Drinking-\	Water System	Conforms
7. Risk Asse	essment	Conforms
8. Risk Asse	essment Outcomes	Conforms
9. Organizat	ional Structure, Roles, Responsibilities and Authorities	Conforms
10. Compete	ncies	Conforms
11. Personne	el Coverage	Conforms
<b>12.</b> Commun	ications	Conforms
13. Essential	Supplies and Services	OFI
<b>14.</b> Review a	and Provision of Infrastructure	Conforms
15. Infrastruc	cture Maintenance, Rehabilitation & Renewal	Conforms
16. Sampling	g, Testing and Monitoring	Conforms
17. Measure	17. Measurement & Recording Equipment Calibration and Maintenance OFI	
18. Emergen	18. Emergency Management Conforms	
19. Internal A	19. Internal Audits Conforms	
20. Managen	20. Management Review Conforms	
21. Continua	l Improvement	Conforms
Major NCR #	Major non-conformity. The auditor has determined one of the following:  (a) a required element of the DWQMS has not been incorporated into a QMS;  (b) a systemic problem with a QMS is evidenced by two or more minor non-conformities; or  (c) a minor non-conformity identified in a corrective action request has not been remedied.	
Minor NCR #	Minor NCR # Minor non-conformity. In the opinion of the auditor, part of a required element of the DWQMS has no been incorporated satisfactorily into a QMS.	
OFI	OFI Opportunity for improvement. Conforms to the requirement, but there is an opportunity for improvement.	
Conforms	Conforms Conforms to requirement.	
NANC	Not applicable/Not Covered during this audit.	
****	Additional comment added by auditor in the body of the report.	
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## PART D. Audit Observations, Findings and Comments

DWQMS Reference:	1 Quality Management System
Client Reference:	DWQMS Operational Plan for the Municipality of Brockton – element 1 Quality Management System, rev. 4, August 25, 2021
Details: Quality Management System is adequately described in the Operational Plan. Reviewed and accepted.	

DWQMS Reference:	2 Quality Management System Policy
Client Reference:	DWQMS Operational Plan for the Municipality of Brockton – element 2 Quality Management System Policy, rev. 5, March 30, 2022
Details, Policy statement adequately describes the goals of the Quality Management System	

Details: Policy statement adequately describes the goals of the Quality Management System. Reviewed and accepted. Through interviews of staff and observations on-site pertaining to the other requirements of the DWQMS, Top Management has demonstrated evidence of the commitment to the Quality Management System.

DWQMS Reference:	3 Commitment and Endorsement
Client Reference:	DWQMS Operational Plan for the Municipality of Brockton – element 3 Commitment and Endorsement Procedure, rev. 0, January 18, 2021

Details: An endorsement of Operational Plan is signed by the Managers and QMS Rep of Veolia Water Canada and the Mayor, CAO and Director of Operations for the Municipality of Brockton in December 2022. Reviewed and accepted. Through interviews of staff and observations on-site, the QMS rep maintains procedures needed for the QMS, management reports, training of personnel and promotion of the QMS.

DWQMS Reference:	4 Quality Management System Representative
Client Reference:	DWQMS Operational Plan for the Municipality of Brockton – element 4 Quality Management System Representative, rev. 3, August 26, 2021

Details: The role of QMS Representative is identified as a distinct position for the Municipality of Brockton. Reviewed and accepted. Through interviews of staff and observations on-site, the QMS rep maintains procedures needed for the QMS, management reports, training of personnel and promotion of the QMS – annual DWQMS training was performed for all staff on October 19, 2023.

DWQMS Reference:	5 Document and Record Control
Client Reference:	DWQMS Operational Plan for the Municipality of Brockton – element 5 Documents and Record Control, rev. 2, January 26, 2023
	A1 Documents and Records Control Procedure, rev. 5, March 15, 2021

Details: Procedure A1 reviewed and accepted. Document changes are managed through updates to revision numbers of documents along with a brief description of the change and the person updating the document and approved (Project Manager). Revision History is starting to be added to procedures. PDFs of all documents are placed onto a shared Google drive for Operations staff to access. Spreadsheets are locked so that Operators can only enter data, not alter the content of the sheet. SCADA system resides on a server in the Veolia office with a redundant server in the Municipality of Brockton office.

DWQMS Reference:	6 Drinking Water System
Client Reference:	DWQMS Operational Plan for the Municipality of Brockton – element 6 Drinking Water System, rev. 1, November 12, 2019
	C-6 Chepstow Drinking Water System, rev. 7, May 3, 2022
	R-6 Lake Rosalind Drinking Water System, rev. 7, August 30, 2021
	W-6 Walkerton Drinking Water System, rev. 7, August 19, 2022
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Details: Operational Plan adequately describes the Chepstow, Lake Rosalind and Walkerton Drinking Water Systems. Reviewed and accepted. Facilities visited during the audit matched the system descriptions.

DWQMS Reference	7 Risk Assessment
Client Reference:	DWQMS Operational Plan for the Municipality of Brockton – element 7 Risk Assessment, rev. 3, November 12, 2019
	B1 Risk Assessment and Outcomes Procedure, rev. 2, May 7, 2018
Details: Procedure B1 accepted.	adequately describes the Risk Assessment Process. Reviewed and

DWQMS Reference:	8 Risk Assessment Outcomes
Client Reference:	DWQMS Operational Plan for the Municipality of Brockton – element 8 Risk Assessment Outcomes, rev. 2, November 12, 2019
	B1 Risk Assessment and Outcomes Procedure, rev. 2, May 7, 2018
	C-B2 Risk Assessment Table - Chepstow Drinking Water System, rev. 12, March 7, 2023
	R-B2 Risk Assessment Table - Lake Rosalind Drinking Water System, rev. 11, March 7, 2023
	W-B2 Risk Assessment Table - Walkerton Drinking Water System, rev. 12, March 7, 2023

Details: Risk Assessment Outcomes adequately describes all risk, hazards, hazardous events and critical control limits for the Drinking Water System and covers all required hazards as described in the MECP document "Potential Hazardous Events for Municipal Residential Drinking Water Systems" as updated in April 2022. Specific response procedures are included in Contingency Plans. Risk assessment outcomes are current as March 7, 2023 when the most recent updates were made.

SCADA alarm settings at Lake Rosalind and Walkerton DWS were observed to be consistent with the Critical Control Points as described in the Risk Assessment Tables

DWQMS Reference:	9 Organizational Structure, Roles, Responsibility and Authorities
Client Reference:	DWQMS Operational Plan for the Municipality of Brockton – element 9 Organizational Structure, Roles, Responsibility and Authorities, rev. 3, May 27, 2019

Details: Organizational Structure, Roles, Responsibilities and Authorities are adequately described in the Operational Plan and associated appendices. Reviewed and accepted. Organizational structure verified as accurate during the audit.

DWQMS Reference:	10 Competencies
Client Reference:	DWQMS Operational Plan for the Municipality of Brockton – element 10 Competencies, rev. 3, November 15, 2021

Details: Competencies are adequately described in the Operational Plan. Reviewed and accepted.

Viewed licenses for operators performing activities for the Brockton Drinking Water Systems:

- Operator license # 15753 (Water Treatment Class 2, exp. March 31, 2026), license # 15754 (Water Distribution & Supply class 2, exp. March 31, 2026)
- ORO license # 57375 (Water Treatment Class 2, exp. Sept 30, 2024), license # 53995 (Water Distribution and Supply Class 3, exp. Feb 28, 2025).

All training activity is tracked in a training spreadsheet to summarize hours needed for license renewal. Outside training completed which count as CEUs for license renewal. Internal training is completed through the J.J. Keller/VNA University and will have a competency component attached to it such as a test (e.g. general Health and Safety Topics, DWQMS topics).

DWQMS Reference:	11 Personnel Coverage
Client Reference:	DWQMS Operational Plan for the Municipality of Brockton – element 11 Personnel Coverage, rev. 5, November 15, 2021
	G1 After Hours Dispatch and Response Procedure, rev. 4, November 15, 2021

Details: Procedure G1 and Operational Plan section 11 reviewed and accepted.

The Brockton Facilities are staffed from Monday to Friday from 7:30 a.m. until 4:00 p.m. and attended on weekends for normal daily rounds. Operator and on-call schedules viewed for March 2024. SCADA dialer will call out any alarms to the central cell phone which is then forwarded to the on-call operator's cell phone. On-call changeover is verified when it occurs every Thursday morning.

DWQMS Reference:	12 Communications
Client Reference:	DWQMS Operational Plan for the Municipality of Brockton – element 12 Communications, rev. 4, November 15, 2021

Details: Operational Plan section 12 reviewed and accepted.

Communication methods reviewed during the audit:

- System Owner Monthly reports on system performance is provided to the System Owner (viewed for February 2024). Annual Management Review, Infrastructure Review, and Annual Reports as required by regulations.
- Operations Staff weekly meetings are performed with all operators (viewed minutes for March 18, 2024) – operational and maintenance updates as well as upcoming training discussed.
- Essential Suppliers Letters outlining QMS Requirements sent out to essential suppliers (schedule in place for letters to be sent every 5 years – viewed letter to Brenntag sent January 23, 2023).
- The Public DWQMS Policy and the Operational Plan are posted on the Municipality of Brockton website. Community requests are taken by the Municipality and forwarded to Veolia (viewed example for water shut-off requested by resident on February 20, 2024). Complaints are handled through same Community Request form (viewed example for Low Pressure complaint on August 2, 2023). No taste/odour complaints generated in the past

year.

DWQMS Reference:	13 Essential Supplies and Services
Client Reference:	DWQMS Operational Plan for the Municipality of Brockton – element 13 – Essential Supplies and Services, rev. 3, February 22, 2018
	H1 Essential Supplies and Services Table, rev. 6, January 23, 2023

Details: Operational Plan section 13 and Essential Supplies and Services Table reviewed and accepted.

Qualifications for essential suppliers viewed:

- Chemicals UL certification to NSF-60 for Chlorine Gas and Certificate of Analysis received with each shipment (Brenntag)
- Advance Meter Services (flow meter calibration) ability of supplier to provide detailed calibration certificate

Opportunity for Improvement: Consider adding requirements for calibration service providers to include qualifications

DWQMS Reference:	14 Review and Provision of Infrastructure
Client Reference:	DWQMS Operational Plan for the Municipality of Brockton – element 14 Review and Provision of Infrastructure, rev. 3, November 12, 2019
	Appendix O1 Infrastructure Review Procedure, rev. 0, April 16, 2018

Details: Operational Plan section 14 and procedure O1 reviewed and accepted. Infrastructure Review is performed as a scheduled meeting with Operations staff and the System Owner Representative (Director of Operations) participates in the review. Topics include recent AWQIs, system performance, raw water trends, system upgrades and outcomes of the most risk assessment. Long-term forecast is captured within the Capital Budget maintained by the municipality (viewed for review performed November 15, 2023 – includes a suggested timeframe for completion of various items – e.g. SCADA system upgrades at Walkerton DWS Well 7/9 and North Booster Station).

Client Reference: DWQMS Operational Plan for the Municipality of Brockton – Infrastructure Maintenance, Rehabilitation and Renewa	-l	
November 12, 2019		

Details: Operational Plan section 15 reviewed and accepted.

Reviewed Maintenance Records for the following pieces of equipment:

- Walkerton (pumphouse, Walker West Booster Station, South Tower), and Lake Rosalind backup generators – monthly load tests performed and recorded on sheets in each pumphouse (viewed for December 2023 to March 2024). External maintenance is performed on a bi-annual basis – viewed for Walkerton and Chepstow generators performed on February 15, 2023 and Lake Rosalind on October 27, 2022.
- Lake Rosalind Chlorine Injection point cleaned monthly recorded on google spreadsheet with daily activities.
- Walkerton UV System maintenance January 29, 2024 (6-month).
- Walkerton Standpipe inspection last performed for North Tower in August 2023 tower drained, inspected, cleaned and re-coated, new connection valve installed – awaiting final

report from contractor. Original inspection report created on July 9, 2020.

 Distribution System flushing and valve turning – viewed for Walkerton DWS flushing – April 2023, Walkerton DWS valve turning throughout 2023

The System Owner is provided with updates on the maintenance program though the monthly reports (viewed for February 2024).

DWQMS Reference:	16 Sampling, Testing and Monitoring
Client Reference:	DWQMS Operational Plan for the Municipality of Brockton – element 16 Sampling, Testing and Monitoring, rev. 5, January 26, 2023
	Sampling, Testing and Monitoring Tables for Chepstow (rev. 4, November 23, 2021), Lake Rosalind (rev. 3, November 23, 2021) and Walkerton (rev. 4, March 24, 2021) Drinking Water Systems

Details: Operational Plan section 16 and Sampling Tables reviewed and accepted.

Reviewed Laboratory Testing Records for the following systems:

- Lake Rosalind Bacterial Testing December 2023, Quarterly Nitrates and THMs/HAAs October 2023, Inorganics/Organics Feb 2023, Fluoride October 2023, Sodium October 2023 (exceeded 20 mg/L limit – notification of Public Health made – AWQI report submitted).
- Walkerton Bacterial Testing December 2023, Quarterly Nitrates and THMs/HAAs October 2023, Quarterly Selenium and Uranium October 2023, Inorganics/Organics

Daily pumphouse parameters are recorded on the google spreadsheets for each system, including chlorine residuals, pump hours, flow rates, turbidity, etc. Viewed for each system for March 2024

DWQMS Reference:	17 Measurement and Recording Equipment Calibration and Maintenance
Client Reference:	DWQMS Operational Plan for the Municipality of Brockton – element 17 Measurement and Recording Equipment Calibration and Maintenance, rev. 1, January 14, 2018
	J1 Measuring and Recording Equipment Calibrations Table, rev. 5, March 22, 2022

Details: Operational Plan section 17 and Calibrations Table reviewed and accepted.

Viewed calibration records for the following equipment:

- Walkerton Well 7 Raw Water Flow meters (cal. April 12, 2023 annual)
- Walkerton Well 9 Raw Water Flow meters (cal. March 28, 2023 annual)
- Walkerton Treated Water Flow Meter (Walker West Booster Station) (cal. April 10, 2023 annual)
- Lake Rosalind Well # 1 Raw Water Flow meter (cal. March 28, 2023 annual)
- Lake Rosalind Well # 3 Raw Water Flow meter (cal. March 28, 2023 annual)
- Lake Rosalind Treated Water Flow Meter (cal. March 28, 2023 annual)
- Truck # 3 Handheld Turbidimeter 14050C032776 monthly verification with reference standards January-March 2024
- Truck # 3 Pocket II Colorimeter 1109E183424 monthly verification with reference standards January-March 2024

- Walkerton UV System monthly checks with reference sensor January-March 2024
- UV Reference sensor TL040423585001 external calibration performed April 6, 2023 (3-year calibration)
- Handheld pH meter SN 221162200065 calibrated prior to use with buffer solutions (last performed Match 7, 2024 according to instrument history panel)

Adjustments to online chlorine analysers or turbidity analysers based on handheld readings and are recorded on the daily operations sheets (viewed example for Walkerton for March 2024 – comment on log sheet that adjusted chlorine analyser based on > 0.05 mg/L reading on handheld. The same process is followed for any online turbidity analysers (e.g. Walkerton and Lake Rosalind). No 3<sup>rd</sup> party calibration is currently is performed on online analysers.

Opportunity for Improvement – Consider creating a record for handheld pH meter calibration prior to use.

DWQMS Reference:	18 Emergency Management
Client Reference:	DWQMS Operational Plan for the Municipality of Brockton – element 18 Emergency Management, rev. 3, November 13, 2019
	K1 Emergency Management Procedure, rev. 1 January 11, 2018

Details: Operational Plan section 18 reviewed and accepted. Separate detailed Contingency Plans are established for each Drinking Water System to cover multiple emergency situations (updated January 8, 2020) and are available to Operators through the Google Drive.

Most recent Emergency Response training was performed on September 25, 2023 for all Brockton Operators on the topic of Cyberattacks.

DWQMS Reference:	19 Internal Audits
Client Reference:	DWQMS Operational Plan for the Municipality of Brockton – element 19 Internal Audits, rev. 2 May 1, 2018
	L1 Internal Audit Procedure and Schedule, rev. 5 May 1, 2018

Details: Operational Plan section 19 and procedure L1 reviewed and accepted. Most recent Internal Audit was performed on December 12-13 by the QMS Representative. No non-conformances and 3 Opportunities for Improvement were noted. Follow-up on OFIs performed as per element 21.

DWQMS Reference:	20 Management Review
Client Reference:	DWQMS Operational Plan for the Municipality of Brockton – element 20 Management Review, rev. 4, Nov. 13, 2019
	M1 Management Review Procedure, rev. 2, June 4, 2019

Details: Operational Plan section 20 and procedure M1 reviewed and accepted. Most recent Management Review was performed on November 15, 2023 with the Operations staff of Veolia and the Director of Operations for the Municipality of Brockton. All required items from element 20 of the standard were covered in the Management Review. No action items were noted from the most recent Management Review. Owner Representative (Director of Operations) signs the last page of the minutes to acknowledge acceptance.

DWQMS Reference:	21 Continual Improvement
Client Reference:	DWQMS Operational Plan for the Municipality of Brockton – element 21 Continual Improvement, rev. 4, May 4, 2018
	N2 Tracking Continual Improvement, rev. 2, November 13, 2019
Client Reference:	

## Client Reference:

Details: Operational Plan section 21 and procedure N2 reviewed and accepted. Examples of Corrective Actions, Preventive Actions and Best Management Practices reviewed included:

- CAR # 1640399-02 from February 2023 External Audit Cybersecurity not addressed in the Risk Assessment Outcomes. Risk Assessment Table updated and new procedure created which was added to Contingency Plan.
- Opportunity for Improvement from Dec 2023 Internal Audit are tracked using the OFI Tracking Sheet – e.g. Organizational Chart to be updated with new Operator
- Best Management Practices are evaluated once every 36 months and commented on using a form attached to the procedure (last done in November 2021, due to be completed by the end of November 2024).

Details regarding the personnel interviewed and objective evidence reviewed are maintained on file at Intertek - SAI Global.

This report was prepared by:

Paul Cartlidge

Intertek - SAI Global Management Systems Auditor

The audit report is distributed as follows:

- Intertek SAI Global
- Operating Authority
- Owner
- **MOECC**

## **Notes**

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