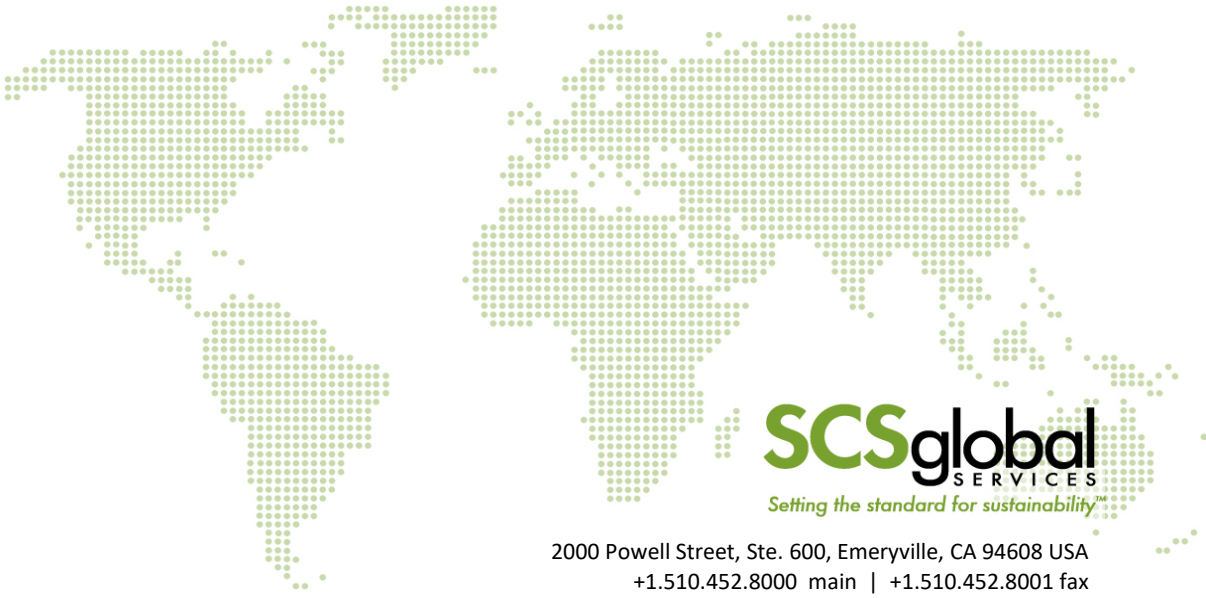
Alliance for Water Stewardship

Audit Report - Nestle Waters North America, Inc.
Ontario, CA Water Bottling Facility
The AWS International Water Stewardship Standard, Version 1.0, April 8th, 2014

Report Issued on 7/24/2017



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Introduction to the Alliance for Water Stewardship
The AWS Standard ("the Standard") is intended to drive water stewardship, which is defined as the use of water that is socially equitable, environmentally sustainable and economically beneficial, achieved through a stakeholder-inclusive process that involves site- and catchment-based actions. Good water stewards understand their own water use, catchment context and shared concerns in terms of water governance, water balance, water quality and Important Water-Related Areas, and then engage in meaningful individual and collective actions that benefit people and nature. The Standard outlines a series of actions, criteria and indicators for how one should manage water at the site level and how water management should be stewarded beyond the boundaries of a site. In this Standard, the "site" refers to the implementing entity that is responsible for fulfilling the criteria. The site includes the facility and the property over which the implementer that is using or managing water (i.e., withdrawing, consuming, diverting, managing, treating and/or discharging water or effluent into the environment) has control.

Assessment Information:	
Client Name	Nestlé Waters North America, Inc. - Ontario, CA
AWS Reference Number	AWS-010-INT-SCS-00-01-0004-0022
Client AWS Representative/Group Manager (Role/Name/Contact info)	Dave Palais, Ph.D., Natural Resource Manager; dave.palais@waters.nestle.com
Audit Team (Role/Name)	Lead Auditor: Brendan Grady, SCS Global Services
	Team Auditor: Nicole Munoz, SCS Global Services
	Technical Expert: Isabella Polenghi-Gross, Ph.D. AMEC Foster Wheeler
Audit dates (DD-DD Month YYYY)	11-12 April, 2017
Audit Location (main site being audited)	Nestlé Waters North America (NWNA) Ontario, California facility; 5772 E. Jurupa St., Ontario, CA 91761, USA
Date(s) of previous audit (if applicable)	
Findings from previous year	☐ YES, see tab 9
SCS Certificate number (if applicable)	
Expiry date of previous certificate (if applicable)	

Scope of Audit (check all applicable boxes)	
The AWS International Water Stewardship Standard Version V1.0 April 8th 2014	
Initial audit	☑ YES
Surveillance audit	☐ YES
Re-certification audit	☐ YES
RE-evaluation audit	☐ YES
Single-site audit	☑ YES
Multi-site audit	☐ YES, see tab 3
Group audit	☐ YES, see tab 3
If yes, please description of the group structure and relationships	

Description of Operations

The NWNA Ontario plant is a water bottling facility, producing bottled water products under the brand names of Arrowhead Mountain Spring Water, Nestlé Pure Life and Gerber. The geographic scope of the site is limited to the property boundary of the facility. The facility itself is located in an urban industrial setting. Water for the bottling facility comes from several sources, including an on-site ground water well to produce bottled purified water, and spring water delivered by pipe or truck from one of several regional springs, both inside and outside of the catchment.

Description of the catchment in which the client operates:

The Ontario plant is located in the Chino Basin, a subset of the larger Santa Ana River Watershed.The catchment for the Ontario facility is approximately 286,000 acres, contained within the larger Santa Ana watershed (1.084 million acres). The catchment includes the smaller Chino and Cucamonga groundwater basins. The plant can receive water from up to six different springs, although only one of these (Deer Canyon) is located within the catchment. The majority of the catchment itself is a developed urban landscape.

Summary of shared water challenges:

Water scarcity has been identified as the primary water shared water challenge in the catchment, due to the multi-year California drought. California drought emergency conditions were lifted by the Governor in April 2017, but the water scarcity remains the primary catchment concern. Other shared water challenges include water quality concerns, particularly from groundwater, and public education surrounding water use.

Site List (multi-site and group operations)

Guidance
Please list all sites/group members below and indicate with an 'x' which were sampled. Multi-site operations: Each site if a multi-site operation shall be audited onsite during initial, surveillance and re-certification audits. If a client requests to add a new site to a multi-site certificate, SCS shall conduct an on-site audit of the site proposed for inclusion before adding that site to the certificate register. Group operations: To ensure that a representative sample (quantity and type) of group members are assessed, sample shall include the Group's central or head office of the group operation; random selection; and judgemental sampling.

Group sampling (justification)
Not Applicable, the certificate covers a single site.

Site Name	Street	Town	State & Zip Code	Contact Person	Email	Phone	Sampled

Audit Attendance

Guidance:
Record in this section the people attending the different parts of the audit. Tick the parts of the audit attended by each person.

Audit Attendence	*Mark attendance with an 'x' as appropriate*				
Role/Title	**Opening meeting**	**Document review**	**Interview**	**Facility Inspection**	**Closing meeting**
Natural Resource Manager, NWNA	x	x	x	x	x
Natural Resource Manager, NWNA	x	x	x	x	x
Natural Resource Manager, NWNA	x	x	x	x	x
Geologist, Haley & Aldrich	x	x	x	x	x
QA Manager, NWNA		x	x		x
Factory Manager, NWNA		x	x		x
Springs Resource Manager, NWNA	x	x	x	x	x
Safety, Health, & Environment, NWNA	x	x	x	x	x

Additional information on audit attendance

The AWS International Water Stewardship Standard, Version 1.0, April 8th, 2014

Criterion #	Standard Provision or Requirement	Major Minor Observation Conforming	Objective Evidence/Notes
STEP 1: COMMIT			
Criterion 1.1	1.1 Establish a leadership commitment on water stewardship: Have the senior-most manager at the site, and if necessary a suitable individual within the corporate head office, sign and publicly disclose a commitment to: - Uphold the AWS water stewardship outcomes (good water governance, sustainable water balance, good water quality status and healthy status of Important Water-Related Areas); - Engage stakeholders in an open and transparent manner; - Strive to comply with legal and regulatory requirements - Respect water-related rights, including ensuring appropriate access to safe water, sanitation and hygiene for all workers in all premises under the site's control; - Support and coordinate with public sector agencies in the implementati on of plans and policies, including working together towards meeting the human right to water and sanitation. - Continually improve and adapt the site's water stewardship actions and plans; - Maintain the organizationa l capacity necessary to successfully implement the AWS Standard, including ensuring that staff have the time and resources necessary to undertake the implementati on; - Support water-related national and international treaties; - Disclose material on water-related information to relevant audiences.		

	1.1.1 Signed and publicly disclosed statement that explicitly covers all requirements (see details in Criterion 1.1)	C	A pledge was reviewed, signed by the site factory manager, containing all elements described in this criterion.
Criterion1.2	1.2 Develop a water stewardship policy: Develop an internally agreed-upon and communicated and publicly available water stewardship policy that references the concept of water stewardship (as informed by the AWS Standard, outcomes and criteria).		
	1.2.1 Publicly available policy that meets all requirements (see Guidance)	C	Nestle's corporate water stewardship policy "Nestle and Water: Sustainability, Protection, and Stewardship" extensively discusses Nestle's commitment to sustainable water use. The policy is publicly available on the Nestle website.
STEP 2: GATHER & UNDERSTAND			
Criterion 2.1	2.1 Define the physical scope: Identify the site's operational boundaries, the sources the site draws its water from, the locations where the site returns its discharge to, and the catchment(s) that the site affect(s) and is reliant upon.		
	2.1.1 Documentation or map of the site's boundaries	C	A map of the site was reviewed. The map includes the property boundaries of the factory, as well as discharge, well, and pipeline sources.
	2.1.2 Names and location of water sources, including both water service provider (if applicable) and ultimate source water	C	A map with the names and locations of water sources was provided. The Ontario facility may receive spring water from up to six different springs and also utilizes an on-site well, for purified products, that draws Chino Basin groundwater.
	2.1.3 Names and location of effluent discharge points, including both water service provider (if applicable) and ultimate receiving water body	C	The site map includes discharge points and a description of the receiving bodies. Wasterwater discharge primarily goes to Inland Empire Utilities Agency. Stormwater discharge is sent to recharge basins.
	2.1.4 Geographical description or map of the catchment(s)	C	A map of the site catchment was provided. The catchment for the Ontario facility is approximately 286,000 acres, contained within the larger Santa Ana watershed (1.084 million acres). The catchment includes the smaller Chino and Cucamonga Groundwater Basins.

Criterion 2.2	2.2 Identify stakeholders, their water-related challenges and the site's sphere of influence: Identify stakeholders, document their water-related challenges and explain how the stakeholders are within the site's sphere of influence.		
	2.2.1 List of stakeholders, descriptions of prior engagements and summaries of their water-related challenges *(TCW in Guidance)*	OBS	A list of stakeholders was provided as part of the audit. Stakeholder focus for this site has primarily been on local stakeholders concerned with the Ontario facility rather than Nestle's national or international ones. NWNA has also developed a corporate initiative for stakeholder mapping (called Community Relations Process) to better understand the local community. The site underwent a stakeholder mapping exercise, ranking stakeholders by Influence and Interest; interviews were conducted by NWNA with all identified and interested stakeholders regarding the AWS process. The audit team conducted interviews with representatives of local ENGOs, the program and associate directors of Inland Empire Waterkeeper, and representatives of two local water authorities, a Chino Basin Watermaster board member and the Cucamonga Valley Water District general manager. OBS 2017.4 was issued: While consultations with stakeholders and audit records provided evidence of active communication between NWNA on water related topics, stakeholders were largely unfamiliar with the specific AWS concepts such as shared water challenges. General understanding of AWS concepts amongst stakeholders could be improved.
	2.2.2 Description of the site's sphere of influence	C	A sphere of influence was provided, although the guidance to the standard allows for this requirement to be met by providing a list of the stakeholders ability to influence or be influenced by the site (Indicator 2.2.1). The sphere of influence is limited to catchment level stakeholders, consciously not including the larger corporate initiatives as a way to keep the focus on the local implementation of the standard.

Criterion 2.3	2.3 Gather water-related data for the catchment: Gather credible and temporally relevant data on the site's catchment's x Water governance, including catchment plan(s), water-related public policies, major publicly led initiatives under way, relevant goals, and all water-related legal, regulatory requirements; x Water balance for all sources while considering future supply and demand trends; x Water quality for all sources while considering future physical, chemical and biological quality trends; x Important Water-Related Areas, including their identification and current status, while considering future trends; x Infrastructure's current status and exposure to extreme events while considering expected future needs. *(TCW in Guidance)*		
	2.3.1 List of relevant aspects of catchment plan(s), significant publicly led initiatives and/or relevant water-related public policy goals for the site *(TCW in Guidance)*	C	A list of Ontario Governance and Site Linkages was provided, including list of different catchment plans, public policy goals and site level opportunities.
	2.3.2 List, and description of relevance, of all applicable water-related legal and regulatory requirements, including legally defined and customary water rights and water-use rights	C	A list of permits and regulatory requirements, was reviewed, including permits issued by public health department, regional water quality control board, and other regulators.
	2.3.3 Catchment water balance by temporally relevant time unit and commentary on future supply and demand trends *(TCW in Guidance)*	OBS	A catchment water balance was provided. However, in some cases data are presented as multi-year climatic values. OBS 2017.5 was issued: Catchment water balance data was in some cases presented as a multi-year average, which could have the effect of muting evidence of trends. Guidance in the standard suggests a goal of monthly data collection in order to maintain temporally relevant data. If such data is not available, the site should work with public sector agencies to develop it before the next renewal assessment in three (3) years.

	2.3.4 Appropriate and credibly measured data to represent the physical, chemical and biological status of the site's water source(s) by temporally relevant time unit, and commentary on any nticipated future changes in water quality	C	All water sources undergo annual quality testing. Results of these tests were reviewed for multiple sources.
	2.3.5 Documentation identifying Important Water-Related Areas, including a description of their current status and commentary on future trends *(TCW in Guidance)*	OBS	List of IWRA sites originally proposed by NWNA was presented and had been reviewed with stakeholders. OBS 2017.6 was issued: Important Water Related Areas were designated by NWNA. However, designation of these could be improved through stakeholder consultation as to the accuracy of the IWRAs. For example, some riparian areas highlighted as locally valuable had not been designated.
	2.3.6 Existing, publicly available reports or plans that assess water-related infrastructure, preferably with content exploring current and projected sufficiency to meet the needs of water uses in the catchment, and exposure to extreme events *(TCW in Guidance)*	C	A reference document was provided with a list of publically available reports of water-related infrastructure. In the case of extreme events, NWNA would likely be called upon to supply water in emergency response.
Criterion 2.4	2.4 Gather water-related data for the site: Gather credible and temporally relevant data on the site's: x Governance (including water stewardship and incident response plan); x Water balance (volumetric balance of water inputs and outputs); x Water quality (physical, chemical and biological quality of influent and effluent) and possible sources of water pollution; x Important Water-Related Areas (identification and status); x Water-related costs (including capital investment expenditures, water procurement, water treatment, outsourced water-related services, water-related R&D and water-related energy costs), revenues and shared value creation (including economic value distribution, environmental value and social value).		

	2.4.1 Copies of existing water stewardship and incident response plans *(TCW in Guidance)*	C	Reviewed incident response plan contained as part of the Stormwater Pollution Prevention Plan (SWPP) and Spill Prevention Control and Countermeasure Plan (SPCCP).
	2.4.2 Site water balance (in Mm3 or m3) by temporally relevant time unit and water-use intensity metric (Mm3 or m3 per unit of production or service) *(TCW in Guidance)*	C	All NWNA sites are required to conduct water maps, containing inputs and outputs of water at each facility. There is extensive mapping with metering at each stage of the bottling process. An example of implementation of the water map was its identification of spillage from bottling as a surprisingly large water loss area. Data recorded continuously (daily) is summed monthly. The site utilizes a Water Withdrawal Ratio to evaluate efficiency, measuring Liters of water used to produce a Liter of product.
	2.4.3 Appropriate and credibly measured data to represent the physical, chemical and biological status of the site's direct and outsourced water effluent by temporally relevant time unit, and possible pollution sources (if noted) *(TCW in Guidance)*	C	Reviewed analytical reports of waste water effluent. The NWNA site discharges most waste water through a "brine line" that is routinely monitored for chemical composition. NWNA is notified and must respond if the effluent quality is out of required limits (e.g. if pH exceeds certain amount).
	2.4.4 Inventory of all material water-related chemicals used or stored on-site that are possible causes of water pollution	C	A list of all chemicals on site was provided. Chemical storage was inspected during audit of the facility.
	2.4.5 Documentation identifying existing, or historic, on-site Important Water-Related Areas, including a description of their status	C	On-site IWRAs were identified, along with current and projected status. The main site is the groundwater borehole for the on-site well and the previous abandoned well.
	2.4.6 List of annual water-related costs, revenues and description/quantification of social, environmental or economic value generated by the site to the catchment	NC	Finances are compiled and reviewed by NWNA corporate headquarters. Normally data is reviewed regionally, not at the level of individual sites such as the Ontario facility. CAR 2017.1 was issued: The standard asks for a list of annual water-related costs, revenues and description/quantification of social, environmental or economic value generated by the site to the catchment. Site level costs were presented, however economic value is tracked at a product level and specific data was not presented. Social and environmental values were also not described or quantified. Thus a true cost benefit analysis of the site to the catchment was not completed.

Criterion 2.5	2.5 Improve the site's understanding of its indirect water use: Identify and continually improve the site's understanding of: x Its primary inputs, the water use embedded in the production of those primary inputs and, where their origin can be identified, the status of the waters at the origin of the inputs; x Water used in outsourced water-related services within the catchment. *(TCW in Guidance)*		
	2.5.1 List of primary inputs with their associated embedded annual (or better) water use and (where known) their country/region/or catchment of origin with its level of water stress	C	A list of inputs had been created as part of a water footprinting analysis, analysis includes source water for bottling as well as water use associated with packaging, transportation, cooling, and end of life. Water from springs outside of the catchment is accounted for in the site's list of primary inputs. Water stress levels for these inputs are similar to those in the catchment.
	2.5.2 List of outsourced services that consume water or affect water quality and both (A) estimated annual (or better) water withdrawals listed by outsourced services (Mm3 or m3) and (B) appropriate and credibly measured data to represent the physical, chemical and biological status of the outsourced annual (or better) water effluent	NC	CAR 2017.2 was issued: The analysis of water use by outsourced service providers was presented at a national level. This large scope approach to the effort overlooked key suppliers specific to the site, including an on-site bottle manufacturer.
Criterion 2.6	2.6 Understand shared water-related challenges in the catchment: Based upon the status of the catchment and stakeholder input, identify and prioritize the shared water-related challenges that affect the site and that affect the social, environmental and/or economic status of the catchment(s). In considering the challenges, the drivers of future trends and how these issues are currently being addressed by public-sector agencies must all be noted.		
	2.6.1 Prioritized and justified list of shared water challenges that also considers drivers and notes related to public-sector agency efforts *(TCW in Guidance)*	C	A prioritized list of shared water challenges was provided, with drought and projected water scarcity being the number one challenge. Other SWC include water quality, public education, and water use efficiency.

Criterion 2.7	2.7 Understand and prioritize the site's water risks and opportunities: Based upon the status of the site, existing risk management plans and/or the issues identified in 2.6, assess and prioritize the water risks and opportunities affecting the site. *(TCW in Guidance)*		
	2.7.1 Prioritized list of water risks facing the site, noting severity of impact and likelihood within a given time frame	C	A prioritized list of water risks for the site was provided, matching the shared water challenges and their priority (drought, water quality, public education, and water use efficiency). Risks were prioritized based on the severity of their impact and likelihood of occurence.
	2.7.2 Prioritized list of water-related opportunities for the site	C	A prioritized list of water opportunities was also provided, matching the risks. For example, better management of water resources is listed as a potential response to the water risk of drought.
	2.7.3 Estimate of potential savings/value creation	NC	CAR 2017.3 was issued: The standard asks for an estimate of potential savings/value creation. Opportunities were presented, but not quantified.
STEP 3: PLAN			
Criterion 3.1	3.1 Develop a system that promotes and evaluates water-related legal compliance: Develop, or refer to, a system that promotes and periodically evaluates compliance with the legal and regulatory requirements identified in Criterion 2.3.		
	3.1.1 Documented description of system, including the processes to evaluate compliance and the names of those responsible and accountable for legal compliance *(TCW in Guidance)*	C	NWNA/Ontario Compliance matrix was reviewed, including individual permits and the staff people reponsible for ensuring compliance to them. An annual environmental audit is conducted every year to ensure that compliance is met.

Criterion 3.2	3.2 Create a site water stewardship strategy and plan: Develop an internally available water stewardship strategy and plan for the site that addresses its shared water challenges, risks and opportunities identified in Step 2 and that contains the following components (see Guidance for plan template): x a strategy that considers the shared water challenges within the catchment, water risks for the site (noting in particular where these are connected to existing public-sector agency catchment goals) and the site's general response (from Criteria 2.6 and 2.7) x a plan that contains: o A list of targets (based upon Criterion 2.7) to be achieved, including how these will be measured and monitored. Note: where identified as a shared water challenge, these targets must be continually improving for the four water stewardship outcomes until such time as best practice is achieved; o A list of annual actions that links to the list of targets; o A budget for the proposed actions with cost/benefit financial information (based, in part, upon financial data from 2.7); o An associated list indicating who will undertake the actions (i.e., who is responsible for carrying out the work) and who will ensure that the work is completed (i.e., who is accountable for achieving the target), including actions of other actors in the catchment; o A brief explanation that speaks to how the proposed actions will affect: (A) water-risk mitigation, (B) water stewardship outcomes and (C) shared water challenges.		
	3.2.1 Available water stewardship strategy	C	A water stewardship strategy was created as part of the AWS process. It is a short document, discussing higher level shared water challenges, such as drought, and laying out key objectives to be developed in more detail in the water stewardship plan.

	3.2.2 Available plan that meets all component requirements and addresses site risks, opportunities and stakeholder shared water challenges *(TCW in Guidance)*	OBS	A detailed water stewardship plan was created as part of the AWS process. The plan is broken into objectives, targets, and actions. There are approximately 20 different actions corresponding to different targets, each with their own metrics, budget, responsible person, status, and other criteria. OBS 2017.7 was issued: The targets and objectives identified in the site water stewardship plan do not all follow the best practice of framing SMART targets (Specific, Measurable, Achievable, Realistic and Time-based).
Criterion 3.3	3.3 Demonstrate responsiveness and resilience to water-related risks into the site's incident response plan: Add to or modify the site's incident response plan to be both responsive and resilient to the water-related risks facing the site.		
	3.3.1 A description of the site's efforts to be responsive and resilient to water-related issues and/or risks in an appropriate plan *(TCW in Guidance)*	C	Existing incident response plans for the plant were already in place for water risks such as chemical spills. NWNA created a Southern California Drought Contingency Plan to evaluate alternate sources of water for the factory during drought conditions.
Criterion 3.4	3.4 Notify the relevant (catchment) authority of the site's water stewardship plans: Contact the appropriate catchment authority/agency (if any) and inform them of the site's plans to contribute to the water stewardship objectives of their catchment plan as identified in Criterion 2.3. *(TCW in Guidance)*		
	3.4.1 Documented evidence of communicating the site's plan to the relevant catchment authority/agency	C	Auditors reviewed the AWS outreach log, including communications with catchment authorities about the AWS process. In person stakeholder interviews confirmed this. NWNA has in the past reviewed and commented on catchment level plans.
STEP 4: IMPLEMENT			

Criterion 4.1	4.1 Comply with water-related legal and regulatory requirements and respect water rights: Meet all applicable legal and regulatory requirements related to water balance, water management and Important Water-Related Areas as well as water-related rights. As noted in Criteria 1.1 and 3.2, where, through its water use, the site is contributing to an inability to meet the human right to safe drinking water and sanitation, the site must also continually work with relevant public sector agencies until this basic human right to water and sanitation is fulfilled.		
	4.1.1 Documentation demonstrating compliance *(TCW in Guidance)*	C	Site level compliance matrix was provided, along with copy of the site's environmental audit report.
	4.1.2 (Catchments with stakeholders who have an unmet human right to safe drinking water and sanitation) Documentation of efforts to work with relevant public sector agencies to fulfil human right to safe drinking water and sanitation.	C	Interviews with catchment water managers do not indicate any unmet human right needs in the catchment. NWNA does become involved by providing bottled water in crisis situations when such a need does arise, but such an event has not occurred within this catchment.
Criterion 4.2	4.2 Maintain or improve site water balance: Meet the site's water balance targets. As noted in Criterion 3.2., where water scarcity is a shared water challenge, the site must also continually decrease its water withdrawals until best practices are met and work with relevant public sector agencies to address the imbalance and shared water challenge. Note: if a site wishes to increase its water use in a water scarce context, the site must cause no overall increase in water scarcity in the catchment and depletion of the site's water source(s) and encourage relevant public sector agencies to address the unlawful water use contributing to the imbalance in the catchment. *(TCW in Guidance)*		

	4.2.1 Measurement-based evidence showing that targets have been met	C	The site has currently been improving water balance through reductions in water use aside from source water use (e.g. xeriscaping, manufacturing water recycling system which recycles 8 million gallons/year). NWNA's goal in the plan is to decrease their water use ratio.
	4.2.2 (Water scarce catchments only) Evidence of continual decrease or best practice	OBS	The site is within a water scarce catchment; NWNA has been working with water agencies in public/private partnership to making additional water available. For example, the Cucamonga Water District through water treatment, making previously unusable water potable through a well water treatment. NWNA committed $970k for biota well treatment caused from legacy pesticides, which will result in approximately 237 million gallons/year of potable water; NWNA converted to xeriscaping around the site in order to reduce landscape irrigation needs by approximately 5 million gallons/year. OBS 2017.8 was issued: The site is located in a water scarce area, and therefore the site must continually decrease its water withdrawals. NWNA has taken affirmative steps to decrease water use on the site, e.g. with waste water recycling. However projections are for an increase in production over the next few years, which would necessitate an increase in water use for bottling. It is currently unclear whether NWNA 's net water use at the site would increase, and if so how it could demonstrate that water scarcity in the catchment would decrease. This is only graded as an observation, as the site is not currently in non-conformance since the time period for calculating net increase does not begin until certification is awarded. This issue will be reviewed again at the first surveillance audit.
	4.2.3 (Sites wishing to increase withdrawals in water scarce catchments only) Evidence of no net increase in water scarcity	OBS	See 4.2.2

Criterion 4.3	4.3 Maintain or improve site water quality: Meet the site's water quality targets. As noted in Criterion 3.2., where water quality stress is a shared water challenge, the site must also continually improve its effluent for the parameters of concern until best practices are met and work with relevant public sector agencies to address the imbalance and shared water challenge. Note: if a site wishes to increase its water use in a water stressed context, the site must cause no overall increase in the degradation of water quality in the catchment and degradation of the site's water source(s) and encourage relevant public sector agencies to address the unlawful water use contributing to the degradation in the catchment.		
	4.3.1 Measurement-based evidence showing that targets have been met	C	Measurement system is in place for water quality targets throughout the site, data from previous monitoring reports was reviewed.
	4.3.2 (Water quality-stressed catchments only) Evidence of continual improvement or best practice	NA	Not applicable, water quality is not a shared water challenge in this context.
	4.3.3 (Sites wishing to increase effluent levels of water quality parameters of concern in water quality-stressed catchments only) Evidence of no net degradation in water quality in the catchment	NA	Not applicable, water quality is not a shared water challenge in this context.
Criterion 4.4	4.4 Maintain or improve the status of the site's Important Water-Related Areas: Meet the site's targets for Important Water-Related Areas at the site. As noted in Criterion 3.2., where Important Water-Related Area degradation is a shared water challenge, the site must also continually improve its Important Water-Related efforts until best practices are met, and the site must not knowingly cause any further degradation of such areas on site. *(TCW in Guidance)*		

	4.4.1 Documented evidence showing that targets have been met	C	Maintenance goals for IWRAs have been set, ongoing conformance to see whether the targets are met will need to be reviewed at surveillance audits.
	4.4.2 (Degraded Important Water-Related Area catchments only) Evidence of continual improvement or best practice	NA	IWRAs are not identified as a shared water challenge in the catchment.
Criterion 4.5	4.5 Participate positively in catchment governance: Continually coordinate and cooperate with any relevant catchment management authorities' efforts. As noted in Criterion 3.2, where water governance is a shared water challenge, the site must also continually improve its efforts until best practices are met *(TCW in Guidance)*		
	4.5.1 Documented evidence of the site's ongoing efforts to contribute to good catchment governance	C	The catchment is in an adjudicated water basin, in which withdrawals from groundwater sources are regulated by an appointed catchment manager known as a watermaster. There is ongoing and frequent communication with catchment managers over water issues.
	4.5.2 (Weak water governance catchments only) Evidence of continual improvement or best practice	NA	Water governance is not identified as a shared challenge.
Criterion 4.6	4.6 Maintain or improve indirect water use within the catchment: Contact the site's primary product suppliers and water-related service providers located in the catchment and request that they take actions to help contribute to the desired water stewardship outcomes.		
	4.6.1 List of suppliers and service providers, along with the actions they have taken as a result of the site's engagement relating to indirect water use	C	A list of national suppliers and outsourced service providers was prepared. The majority of input providers have compiled water usage data.
Criterion 4.7	4.7 Provide access to safe drinking water, adequate sanitation and hygiene awareness (WASH) for workers on-site: Ensure appropriate access to safe water, effective sanitation and protective hygiene for all workers in all premises under the site's control.		

	4.7.1 List of actions taken to provide workers access to safe water, effective sanitation and protective hygiene (WASH) on-site *(TCW in Guidance)*	C	NWNA uses a self-assessment tool at each site to review access to drinking water, sanitation and hygiene awareness (WASH). The nature of the product made at the facility requires strict adherence to these principals. No major gaps were identified at the Ontario facility.
Criterion 4.8	4.8 Notify the owners of shared water-related infrastructure of any concerns: Contact the owners of shared water-related infrastructure and actively highlight any concerns the site may have in light of its risks and shared water challenges.		
	4.8.1 List of individuals contacted and key messages relayed *(TCW in Guidance)*	C	A key piece of shared infrastructure exists between NWNA and a local water utility. Shared maintenance activities are performed on this infrastructure. Noted in the stakeholder log.
STEP 5: EVALUATE			
Criterion 5.1	5.1 Evaluate the site's water stewardship performance, risks and benefits in the catchment context: Periodically review the site's performance in light of its actions and targets from its water stewardship plan to evaluate: x General performance in terms of the water stewardship outcomes (considering context and water risks), positive contributions to the catchment, and water-related costs and benefits to the site. *(TCW in Guidance)*		
	5.1.1 Post-implementation data and narrative discussion of performance and context (including water risk)	OBS	Opportunities to evaluate post-implementation performance is still limited. NWNA did undergo a pre-assessment, which can be used as an initial evaluation of AWS performance, and many issues identified in the pre-assessment report have been addressed. OBS 2017.9 was issued: Data and records presented during the audit were not always of a consistent time period, with some data sets ending in 2016, and others clearly referring to 2017 events. The relevant data set for the audit could be better clarified.
	5.1.2 Total amount of water-related costs, cost savings and value creation for the site based upon the actions outlined in 3.2 (drawn from data gathered in 2.4.6)	C	As the AWS standard is still in its initial implementation phase, this will be reviewed during future assessments.

	5.1.3 Updated data for indicator 2.4.7 on catchment shared value creation based upon the actions outlined in 3.2	C	As the AWS standard is still in its initial implementation phase, this will be reviewed during future assessments.
Criterion 5.2	5.2 Evaluate water-related emergency incidents and extreme events: Evaluate impacts of water-related emergency incidents (including extreme events), if any occurred, and determine effectiveness of corrective and preventive measures. Factor lessons learned into updated plan.		
	5.2.1 Documented evidence (e.g., annual review and proposed measures)	C	No water related emergency events occurred in the past 10 years (most recent event would have been a wildfire near a spring site in 2003); A drought mitigation plan is in place. Minor events have occurred on site, such as diesel spill, which was cleaned using appropriate spill kits and disposed of by a third party waste specialists. An annual environmental review documents any such incidents.
Criterion 5.3	5.3 Consult stakeholders on water-related performance: Request input from the site's stakeholders on the site's water stewardship performance and factor the feedback/lessons learned into the updated plan.		
	5.3.1 Commentary by the identified stakeholders *(TCW in Guidance)*	OBS	Stakeholder comments were summarized particularly in response to implementation of the AWS standard. OBS 2017.10 was issued: Records of stakeholder comments did not include the full spectrum of stakeholder perspectives. It was discussed during the audit that stakeholders opposed to NWNA's water use were contacted, but chose not to actively engage in the AWS process. The records of stakeholder comments would be improved if all stakeholder's contacted were included in the site's register of comments, regardless if they chose to respond and participate in the AWS process.
Criterion 5.4	5.4 Update water stewardship and incident response plans: Incorporate the information obtained into the next iteration of the site's water stewardship plan. Note: updating does not apply for initial round of Standard implementation.		

	5.4.1 Modifications to water stewardship and incident response plans incorporating relevant information *(TCW in Guidance)*	NA	This criterion will be reviewed during future assessments.
STEP 6: COMMUNICATE & DISCLOSE			
Criterion 6.1	6.1 Disclose water-related internal governance: Publicly disclose the general governance structure of the site's management, including the names of those accountable for legal compliance with water-related laws and regulations.		
	6.1.1 Disclosed and publicly available summary of governance at the site, including those accountable for compliance with water-related laws and regulations *(TCW in Guidance)*	C	An organizational chart listing key personnel is available upon request and presented during facility open houses and public meetings.
	6.2 Disclose annual site water stewardship performance: Disclose the relevant information about the site's annual water stewardship performance, including results against the site's targets. *(TCW in Guidance)*		
	6.2.1 Disclosed summary of site's water stewardship results	C	A stakeholder presentation was reviewed, discussing the site's water stewardship performance. The stakeholder presentation was most recently given to catchment water managers just prior to the assessment.
	6.3 Disclose efforts to address shared water challenges: Publicly disclose the site's shared water challenges and report on the site's efforts to help address these challenges, including all efforts to engage stakeholders and coordinate and support public-sector agencies. *(TCW in Guidance)*		
	6.3.1 Disclosed and publicly available description of shared challenges and summary of actions taken to engage stakeholders (including public-sector agencies)	C	A stakeholder presentation was reviewed, discussing the site's water stewardship performance. The stakeholder presentation was most recently given to catchment water managers just prior to the assessment.

	6.4 Drive transparency in water-related compliance: Make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences. Note: any site-based violation that can pose an immediate material threat to human or ecosystem health from use of or exposure to site-related water must be reported immediately to relevant public agencies.		
	6.4.1 Available list of water-related compliance violations with corresponding corrective actions	C	All violations are publicly available through regulatory reporting. The site has never had a penalty. 7 total violations occurred since 2006. Most violations were related to pH regulation, resulting in replacement of the system in 2011. Violations have been self-reported. Additionally, Inland Empire Water does sampling of wastewater as well.
	6.5 Increase awareness of water issues within the site: Strive to raise the understanding of the importance of water issues at the site through active communications.		
	6.5.1 Record of awareness efforts (dates and communication) and, if possible, level of awareness *(TCW in Guidance)*	C	Plant-wide meetings include AWS references, including water related concerns within the factory. All CA staff were given drought kits. Monthly presentations to staff, as of the audit (April 12, 2017) the most recent presentation was March 6, 2017. Staff are engaged in water issues, bringing up topics such as water filling spillage; involvement in water conservation topics featured at the open house.

Alliance for Water Stewardship Certification Requirements, Version 1.0, July 2015

Requirement	Conforms			Objective Evidence Reviewed / Finding
	Yes	No	N/A	
7 Communication of AWS Assets				
7.1 General				
7.1.3 Only those persons or entities who have obtained authorization shall be permitted to communicate referring to AWS assets.				
7.1.4 All use must be used in conformity with the current AWS requirements.				
7.1.5 AWS requires that implementers and clients control all of their communications in relation to any AWS asset(s).				
7.1.6 CABs shall review the client's use of AWS assets at all conformity assessments, surveillance audits, and re-assessments.				
7.1.7 Continuing certification shall be conditional upon clients demonstrating control over all communications referring to conformance with the AWS Standard and the AWS Verification System, including the use of all AWS assets. This control must cover:				
7.1.7.1 business-to-business correspondence and sales documentation;				
7.1.7.2 all use of AWS assets off-product (e.g., in promotional material, reports or to media); and				
7.1.7.3 any approved AWS assets that are developed in the future.				
7.1.8 For the avoidance of doubt, at present, AWS assets are not allowed in direct consumer communication (e.g., on product labels).				
7.1.9 Additional guidance on the communication of AWS assets is found in Appendix 2 *[copied to the right of this checklist for your convienience].*				
7.2 AWS Claims				
7.2.1 The current list of AWS claims is shown in Table 6 *[copied to the right of this checklist for your convenience.]*				
7.4 Certified Claims, Single Site				
7.4.4 The authorization for use of AWS assets shall remain valid for the period of certificate validity.				
7.4.4.2 Upon suspension of a certificate (e.g. due to unresolved major non-conformities), the client's authorization to use AWS assets shall expire.				
7.4.5 Certified clients may make either of the following two AWS claims:				
7.4.5.1 Version 1c; and/or				
7.4.5.2 Version 2c.				
7.5 Certified Claims, Multi-Site and Group Operations				
7.5.1 AWS assets can be communicated by organizations that are certified under the AWS group requirements but must be approved by the central office (i.e., the AWS Group Representative) responsible for managing the group operation. The centralized use of AWS assets shall be managed by this central office and may include a network of local offices.				
7.5.2 Multi-site organizations shall seek approval from AWS in writing at least thirty (30) days in advance of any proposed usage of AWS assets.				
7.6 Corporate Claims				
7.6.1 Select AWS assets can be communicated by entities that own or control multiple sites with independent self-verification(s) and/or certification(s). Such entities may be private or public (e.g., corporations or public sector agencies) and must have at least one self-verified site or one certified site to be eligible to make use of the assets described below.				
7.6.1.1 Note: Prior to the entities described in 7.6.1 using AWS assets, those entities shall seek approval from AWS in writing at least thirty (30) days in advance of any such proposed usage.				
7.6.2 Access to AWS assets is contingent on type of assessment performed on the multi-site operation:				
7.6.2.1 Entities with certification of multi-site operations are allowed to employ the full range of AWS assets permitted under certification communications (see Appendix 2).				
7.6.2.2 Entities with self-verification of multi-site operations will only be permitted to use assets as listed in Appendix 2; and				
7.6.2.3 Entities which have a mix of self-verified and certified sites must abide by the respective requirements listed in section 7.6.3 below.				

7.6.3 Entities that own or control numerous AWS self-verified site are not entitled to use AWS claims 3b, 4a, or 5a, however, they may employ the following AWS claim:				
7.6.3.1 Version 3a.				
7.6.4 In addition to using one or more AWS assets, entities with one or more certified sites are permitted to make claims related to the number and percentage of certified units through one or more of the following AWS claims:				
7.6.4.1 Version 3b;				
7.6.4.2 Version 4a; and/or				
7.6.4.3 Version 5a.				
7.6.5 Lastly, if an entity has multiple sites certified to different AWS performance levels (i.e., Core, Gold or Platinum), then they must make a separate claim for each set of sites at a given level. If an entity wishes to combine sites into a single claim, they must use the lowest certified level for all sites. For example, if an entity has four sites certified out of a total of 8 – 2 core, 1 gold and 1 platinum, but wishes to combine them into one claim, the claim must speak either to only core certification or break it down by level. In other words, "Organization ABCD has 50% of its total number of production sites certified by a third party to the AWS global water stewardship standard. www.allianceforwaterstewardship.org". Alternatively, they may employ one of the following claims:				
7.6.5.1 Version 4b; and/or				
7.6.5.2 Version 5b.				
7.6.6 In all cases, the AWS certification logo should be directly visible in the same field of view as the claims (assets) mentioned above.				
7.6.7 In no case is the use of the general AWS logo permitted unless agreed to by AWS.				
7.6.8 For the avoidance of doubt, under no circumstance is the AWS certification logo permitted on product.				

Alliance for Water Stewardship Certification Requirements, Version 1.0, July 2015

Requirement	Conforms			Objective Evidence Reviewed / Finding
	Yes	No	N/A	
5 Requirements for Group Operations				
5.1 Group Management				
5.1.1 The management of the group must be clearly defined.				
5.1.2 The group shall identify the person with overall management responsibility for the group.				
5.1.3 The group shall nominate an 'AWS Group Representative' who assumes overall responsibility for the group's implementation of and compliance with the AWS Standard and AWS certification requirements and serves as the primary contact for AWS communications.				
5.1.4 Group management shall be responsible for: 5.1.4.1 Establishing a common management framework which explicitly adopts the objective of responsible water stewardship;				
5.1.4.2 Ensuring that the group structure and the internal control system (ICS) are in conformance with requirements of the AWS Standard and AWS requirements for group operations;				
5.1.4.3 Ensuring that all members within the group operation are in conformity with the AWS Standard;				
5.1.4.4 Providing evidence to show that all members within the group operation are in conformity with the AWS Standard;				
5.1.4.5 Ensuring that records for all member sites are maintained up to date;				
5.1.4.6 Preparing and approving documents, processes and procedures to be used by all sites within the scope;				
5.1.4.7 Ensuring that all members have an adequate understanding of the AWS Standard;				
5.1.4.8 Carrying out yearly internal audits at all sites within the scope;				
5.1.4.9 Following up on non-conformities raised during internal audits; and				
5.1.4.10 Following up on non-conformities raised during external audits (i.e. during third-party conformity assessments).				
5.2 Group ICS				
5.2.1 The group shall operate an Internal Control System (ICS) which meets the requirements of the AWS Standard and AWS certification requirements.				
5.2.2 At a minimum, the ICS shall include or incorporate each of the following: 5.2.2.1 a documented set of procedures covering group processes;				
5.2.2.2 a detailed description of how production units are structured;				
5.2.2.3 appropriate procedures for maintenance of records;				
5.2.2.4 records from internal audits of production units; and				
5.2.2.5 a description of the responsibilities of staff of production units and ICS.				
5.2.3 In addition to the foregoing, the ICS shall identify the applicable AWS Standard and how non-conformities from internal audits are dealt with according to a set of procedures and sanctions.				
5.4 Group Membership Agreement				
5.4.1 Each group member shall indicate, by way of signature or practical alternative (e.g., in the case of illiterate members), their entry into a contract or agreement with group management to coordinate and pursue AWS certification as a group operation, known as the 'Group Membership Agreement'.				
5.4.2 Group management shall make sure that each group member understands the implications of entering into the Group Membership Agreement.				
5.4.3 The Group Membership Agreement shall contain at least the following: 5.4.3.1 a commitment by the group member to fulfill the requirements of the AWS Standard and applicable AWS Certification Requirements;				
5.4.3.2 a commitment by the group member to provide the group management with required information per the needs of the ICS in a timely manner;				
5.4.3.3 acceptance by the group member of internal and external audits;				
5.4.3.4 an obligation for the group member to report non-conformities; and				
5.4.3.5 the rights of group management to terminate the membership of any member if continued participation by that member threatens the credibility of the group.				
5.5 Group Member Requirements				

5.5.1 Group management shall ensure that all members shall have an adequate understanding of the AWS Standard as well as a copy of, or at least access to, the specified requirements determined by the group (Standard and certification requirements). Where appropriate, this can include diagrams or pictures that explain the requirements. Depending on the needs of the group, the document can be an internal standard developed by the group or the (external) AWS Standard in its entirety. The documents such as contracts and internal standards which the group members need to understand shall be written in a way that is adapted to their local language and knowledge.				
5.5.2 Records covering the relationship between the group management and group members shall be maintained and kept up to date.				
5.5.3 The AWS Group Manager shall keep the following information up to date: 5.5.3.1 Copies of contracts between the group and individual group members;				
5.5.3.2 group member list;				
5.5.3.3 maps of sites and property areas;				
5.5.3.4 internal audit reports;				
5.5.3.5 non-conformities (both minor and major), sanctions and follow-up action arising from both internal audits and external audits; and				
5.5.3.6 complaints and appeals (to group management, the CAB, or AWS directly).				
5.5.4 The internal audits shall be conducted with sufficient scope and detail to provide group management with a robust appraisal of whether or not each group member continues to maintain conformity with the AWS Standard and certification requirements.				
5.5.5 Each member of the group shall be internally audited on at least once per year.				
5.5.6 New or proposed group members shall always be subject to an internal audit before they may be added to the list of group members (5.3.13).				
5.5.7 The AWS Group Representative shall perform an annual review of the status of all members of the group, and shall take a decision as to continuing membership of each member. This decision shall be based on internal audits and other information. Safeguards shall be in place to ensure that internal auditors are not unduly influenced in their findings by group management or group members.				
5.5.8 Group members should have the right to appeal internal audit findings of non-conformity.				
5.5.9 Group management may assume the responsibility of maintaining the operational records on behalf of individual members.				
5.5.10 All group members shall be recorded on a list. The list of group members shall be updated annually or more often if necessary and shall include at least the following information for each member:				
5.5.10.1 name of the member or code assigned to the member;				
5.5.10.2 location				
5.5.10.3 the nature (product types) and volume of production;				
5.5.10.4 volume of water use (inputs and outputs);				
5.5.10.5 current membership status (including any non-conformities and corrective action plans);				
5.5.10.6 date(s) of most recent internal audit;				
5.5.10.7 date(s) of most recent external audit; and				
5.5.10.8 any other group-specific information as may be needed.				
END				

Please provide commentary on the competency and impartiality of the group to maintain conformance with the AWS Standard and AWS group requirements.
Please enlarge this text box as needed
Please provide commentary on the competency of the internal auditors to undertake internal audits as part of a group operation.

Please enlarge this text box as needed
Please provide commentary on on the reliance that can be placed upon the internal auditor's finding of conformance / non-conformance of the group.
Please enlarge this text box as needed
Please provide a comparison of the audit team's findings with the findings made by the group entity, and the reliance that can be placed upon the group entity's findings of conformance / non-conformance;
Please enlarge this text box as needed

Audit Non-conformities and Observations

Guidance
Disclaimer: auditing is based on a sampling process of the available information and therefore nonconformities may exist which have not been identified. Observations are defined as an area of concern regarding a process, document, or activity where there is opportunity for improvement. Major non-conformity is raised if the issue represents a systematic problem of substantial consequence; the issue is a known and recurring problem that the client has failed to resolve; the issue fundamentally undermines the intent of the AWS Standard; or the nature of the problem may jeopardize the credibility of AWS. **Applicants** must close* major NCR within Ninety (90) days of the NCR issue date. Failure to meet this deadline will require another conformity assessment. **Certificate Holders** must close* major NCR within Thirty (30) days of the NCR issue date. If the Major NCR is not addressed within 30 days SCS shall suspend or withdraw the certificate and reinstatement shall not occur before another conformity assessment has been successfully completed. Minor non-conformity: Where the audit team has evaluated an audit finding and determines that the seriousness of the issue does not meet the any of the criteria for Major non-compliance the audit team shall grade the finding as a minor non-conformity. **Applicants** must submit an acceptable corrective action plan^ to address all minor non-conformities to be recommended for certification. **Certificate Holders** must close minor NCR within Ninety (90) days of the NCR issue date. SCS may agree to an alternative time frame with the client as long as this can be justified and is documented in the NCR report. If corrective actions are inadequate to resolve a minor non-conformity by the time of the next scheduled audit, SCS shall upgrade the audit finding to a major non- conformity. If an unusually large number of minor non-conformities are detected during the course of a single audit, the audit team may at their discretion raise a major non-conformity to reflect a systematic failure of the client's management system to deliver conformity with the AWS Standard. ** closed = actioned by the client, corrections & corrective actions verified and closed by the auditor.* *^The corrective action plan shall include an analysis of the root cause of the minor non-conformity; the specific corrective action(s) to address the minor non-conformity; and an appropriate time frame to implement corrective action(s).*

NC #	Criteria / Indicator #	Major – Detail on Non Conformance	Due Date (XX calendar Days)	Root Cause Analysis and Corrective Action Taken

NC #	Section #	Minor – Detail on Non Conformance	Due Date (XX calendar Days)	Corrective Action Taken
2017.1	**2.4.6**	**The standard asks for a list of annual water-related costs, revenues and description/quantification of social, environmental or economic value generated by the site to the catchment. Site level costs were presented, however economic value is tracked at a product level and specific data was not presented. Social and environmental values were also not described or quantified. Thus a true cost benefit analysis of the site to the catchment was not completed.**	**21-Jul-17**	**Root Cause Analysis:** Currently, the company tracks financial data by total brand values and not at a factory-specific level. However, costs and revenues presented in 02.04.06_WF17_AWS_v1.pdf represent the financial data as specifically attributed to the Ontario factory, where possible. The business sensitive nature of the financial information and the brand aggregate values led to presentation of some N/A values. **Corrective Action:** Revised water-related costs and revenues will be presented and/or estimated for the Ontario site, where possible and where company determines proprietary information is not required to be disclosed. Explicit references will be made regarding social and environmental values provided to the catchment.

2017.2	**2.5.2**	**The analysis of water use by outsourced service providers was presented at a national level. This large scope approach to the effort overlooked key suppliers specific to the site, including an on-site bottle manufacturer.**	**21-Jul-17**	**Root Cause Analysis:** The outsourced service providers presented in 02.05.02_WF17_AWS_v1.pdf were specific to the Ontario factory. Additional review of the outsourced service providers by additional management level NWNA personnel is necessary to ensure completeness. **Corrective Action:** The on-site bottle manufacturer will be included in future AWS engagement. Additionally, the outsourced service providers list shall be sent to the factory manager, operations manager, blow mold manager, technical manager, quality assurance manager, and natural resources manager with a request to add any missing vendors, ensuring identification of all appropriate providers. Any new identified vendors will then receive the same AWS outreach as the other providers including solicitation of water use data and future AWS participation.
2017.3	**2.7.3**	**The standard asks for an estimate of potential savings/value creation. Opportunities were presented, but not quantified.**	**21-Jul-17**	**Root Cause Analysis:** The savings/value creation information presented in 02.07.03_WF17_AWS_v1.pdf included specific values for quantifiable items and narrative statements for items that are not reasonably able to be quantified; however, attempts could have been made to provide estimates for the outstanding items. **Corrective Action:** Quantified values will be assigned to all potential savings/value creation opportunities.

OFI #	Section #	Observation – Detail on Opportunity for Improvement	Due Date	Corrective Action Taken
2017.4	**2.2.1**	**While consultations with stakeholders and audit records evidenced active communication between NWNA on water related topics, stakeholders were largely unfamiliar with the specific AWS concepts such as shared water challenges. General understanding of AWS concepts amongst stakeholders could be improved.**		**Note:** We understand the observation and will take the advice under consideration. No Corrective Action Plan required.
2017.5	**2.3.3**	**Catchment water balance data was in some cases presented as a multi-year average, which could have teh effect of muting evidence of trends. Guidance in the standard suggests a goal of monthly data collection in order to maintain temporally relevant data. If such data is not available, the site should work with public sector agencies to develop it before the next 3 year assessment.**		**Note:** We understand the observation and will take the advice under consideration. Publicly available data in Catchment plans provides relevant data on an annual basis and was presented in 02.03.03_WF17_AWS_v1.pdf. We will work with public sector agencies to gather monthly data prior to the next renewal assessment. No Corrective Action Plan required.

2017.6	**2.3.5**	**Important Water Related Areas were designated by NWNA. However, designation of these could be improved through stakeholder consultation as to the accuracy of the IWRAs. For example, some riparian areas highlighted as locally valuable had not been designated.**		**Note:** We understand the observation and will take the advice under consideration. No Corrective Action Plan required.
2017.7	**3.2.2**	**The targets and objectives identified in the site water stewardship plan do not all follow the best practice of framing SMART targets (Specific, Measurable, Achievable, Realistic and Time-based).**		**Note:** We understand the observation and will take the advice under consideration. No Corrective Action Plan required.
2017.8	**4.2.2**	**The site is located in a water scarce area, and therefore the site must continually decrease its water withdrawals. NWNA has taken affirimative steps to decrease water use on the site, e.g. with waste water recycling. However projections are for an increase in production over the next few years, which would necessitate an increase in water use for bottling. It is currently unclear whether NWNA 's net water use at the site would increase, and if so how it could demonstrate that water scarcity in the catchment would decrease. This is only graded as an observation, as the site is not currently in non-conformance since the time period for calculating net increase does not begin until certification is awarded. This issue will be reviewed again at the first surveillance audit.**		**Note:** We understand the observation and will take the advice under consideration. We agree that efforts by NWNA have already been undertaken to increase water use efficiency, decrease water usage, and to understand NWNA's effect on Catchment water balance. In the event NWNA wishes to increase production at the Ontario factory, NWNA will work with Catchment governance authorities to formalize documentation of no net increase in water scarcity. These items will be enacted by the first surveillance audit. No Corrective Action Plan required.
2017.9	**5.1.1**	**Data and records presented during the audit were not always of a consistent time period, with some data sets ending in 2016, and others clearly referring to 2017 events. The relevant data set for the audit could be better clarified.**		**Note:** We understand the observation and will take the advice under consideration. No Corrective Action Plan required.
2017.10	**5.3.1**	**Records of stakeholder comments did not include the full spectrum of stakeholder perspectives. While stakeholders opposed to NWNA's water use were contacted and chose not to actively engage in the AWS process. However, these stakeholder perspectives are still known, and could be included in site's register of comments.**		**Note:** We understand the observation and will take the advice under consideration. No Corrective Action Plan required.

Previous Year Findings

Guidance
Copy list of findings from preivous year's summary report and include an evaluation of the current status of each non-conformity, the site's analysis of root cause; and the effectiveness of corrective action(s) taken.

NC #	Criteria / Indicator #	Major – Detail on Non Conformance	Due Date (XX calendar Days)	Root Cause Analysis and Corrective Action Taken	Status/Comments

NC #	Section #	Minor – Detail on Non Conformance	Due Date (XX calendar Days)	Corrective Action Taken	Status/Comments

Certification Decision

Guidance
The recommendation section to be filled out by the auditor with optional comments. The Certification Decision section is to be completed by the SCS's decision-making entity after initial, re-certification and re-evaluation audits. Details of the decision making entity and any observations or further details can be included in the comments field.

Auditor's recommendation for initial, continued or re-certification based on compliance with requirements:	**X**	Initial Certification **Recommended**
		Initial/Continued Certification **Not Recommended**
Level of certification recommended (if applicable):	X	AWS Core
		AWS Gold
		AWS Platinum
Comments (e.g. justification for change in certification level, recommendations for sampling):		

To be completed by the SCS Decision-Making Entity	**SCS Certification Decision:**	**X**	**Approved**
			Denied
	Certification decision by:	**Erik Hanba**	
	Technical Review by:	Nicole Munoz	
	Date of decision:	16 June 2017	
	Surveillance schedule:	**Next audit is scheduled for** *(include range)* **:** April 2018, no later than May 12, 2018	