Assessment Report

Client Name	Nestlé Waters Hellas
Site	Korpi Factory
Address	Korpi Factory, Monastiraki, Vonitsa, Aitoloakarnania, Greece 30002
AWS Reference Number	AWS-010-INT-CAB-00-04-0004-0034
ERM CVS Assessment Number	0479098
Site Visit Dates	30-31 July 2019

Certification Standard	**Assessment Type**
International Water Stewardship Standard, version 1	Stage 1 and 2 combined

ERM Certification and Verification Services

.

Assessment Report

Scope of Certification

Nestlé Waters Hellas Factory at Monastiraki, Vonitsa, Aitoloakarnania, Greece 30002

Catchment

Monastirakiou and Vonitsa-Voulkaria groundwater systems

Scope of the Assessment

All activities at the Korpi Factory near Monastiraki Village, Greece, including groundwater abstraction, water bottling, wastewater treatment, and stormwater and wastewater discharge into the environment

Assessment Criteria

International Water Stewardship Standard, version 1.0

Assessment Findings Synopsis

The objective of the assessment was to confirm whether the water stewardship activities at the site detailed above are undertaken in a manner that is transparent and stakeholder-inclusive and conform to the AWS International Water Stewardship Standard's core criteria. The objective of the Standard is to achieve the following water stewardship outcomes:
(1) good water governance,
(2) sustainable water balance,
(3) good water quality status and
(4) healthy status of Important Water-Related Areas.

The objective of the assessment has been fulfilled and the audit team was able to reach conclusions as to whether the site's water stewardship system and activities are delivering the Standard's objectives. These conclusions are summarised below.

The assessor was genuinely impressed with much that they encountered, for example:

- Strong leadership involvement and ownership of water stewardship
- Comments from the initial document review were genuinely and well followed up
- The site has been working on water stewardship for several years and now filled the gaps to comply with the AWS Standard
- Close relations with the Vonitsa municipality and Monastiraki village

No non-conformities were identified, only observations raised indicating possible areas of improving the water stewardship activities.

Whilst all the standard's criteria were assessed, the assessment conducted was based on sampling and therefore issues may exist which have not been identified.

Catchment description

The site draws its water from groundwater aquifers located in Korpi synclinal groundwater sub-system. As the region is karstic, these sub-system connect with other sub-systems, including Korpi anticlinal kakirite sub-system where the wells of the municipality are located. These small sub-systems are located in Monastirakiou and Vonitsa-Voulkaria groundwater systems (groundwater bodies using the terminology of the EU Water Framework Directive).

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Shared water challenges

The following shared water challenges have been identified by the site following its stakeholder engagement:

- Perception about Water Quantity in the Area: population is concerned about the available water in the area, especially during summer
- Water Quality in the catchment due to farming activities: the site is surrounded by minor farming activities and there are a lot of agricultural fields in the plain, until Vonitsa. These activities could potentially harm the quality of the water due to the use of fertilizers.
- Rational water usage in the catchment: irrigation is done without control of the withdrawals, leading to a risk of over pumping in the plain. Moreover, infrastructure for potable water suffers from leakage and lack of governance
- Education about water (water challenges), rational usage and water preservation: Raise awareness on the use of water targeting mainly farmers and children

Certification level to be awarded

Core

Status of Previous Assessment Findings

NC Number	Verification Status	Nonconformity	Evaluation of the site's analysis of root cause and the effectiveness of corrective action(s) taken
N/A	Choose an item.		

Recommendations

Based on the status of conformance of the water stewardship activities of the site to the standard, the site is recommended for certification.

Recommended Changes to Scope

The assessment scope is considered to be appropriate.

Required Notifications

N/a

Audit findings

Summary of audit findings against each indicator is included in Appendix A for all core criteria. Advance criteria have not been assessed. Non-conformities and observations are detailed below.

Summary of AWS indicators according to the 6 steps of the Standard

1. (Commit). The site has communicated its commitment to water stewardship to its stakeholders. The site's leadership is driving the relationships with stakeholders and demonstrates leaderships' ownership of water stewardship. Nestlé's corporate policy on water stewardship applies to the site.
2. (Gather & understand). The site has well defined the physical scope of its water sources, discharge locations and relevant groundwater recharge area, and has taken very good effort to understand how the groundwater aquifer level from which the site abstracts its water, relates to other layers where other users of water in the catchment draw their water from. This includes considerable work undertaken on water balance. The site appears to have hardly any impact on the surface water bodies. The site has been monitoring water quality in its wells for many years but now it also analysed samples from other wells located further from the site. There is a protected area nearby that partially overlaps with the recharge area of the site's wells. The site has taken appropriate first steps to improve its understanding of indirect water use. The stakeholders are well understood. The shared water challenges, site risks and opportunities are well understood. Observations Ob1 to Obs5 were raised on what aspects can be further improved going forward.
3. (Plan). The site has worked on stakeholder relations and shared challenges since 2016. The water stewardship plan is a rolling plan, where measures often span more than a year to implement. The plan is appropriate for the site's and catchment's context and data collected to date. The site has a good understanding of regulatory and contractual requirements and has appropriate water-related emergency response plans.
4. (Implement). The site's records demonstrate good compliance with legal and contractual water-related requirements. It is testing its preparedness for emergency situations. The site has demonstrated a track record of water savings and has a low water loss ratio (normalised for production). Although the ratio has slightly increased in the last year, this was expected due to changes to the cleaning-in-place process. The site is tracking implementation of measures identified in the site's stakeholder relations plan where water stewardship plan is integrated. The site is keeping good working relationships with the key water-related stakeholders and is well cooperating with the municipality to help it better understand the groundwater system's status and improve management of water abstraction.
5. (Evaluate). The site is well tracking its performance, discusses it with the stakeholders and appears responsive to their concerns.
6. (Communicate & disclose). The results have been appropriately disclosed to the stakeholders.

Identified Observation

Observation Number: 0479095/NP/Obs1

Observation:

Based on information provided by the hydrogeologist investigating the area, the site should further investigate :

- if there is flow in the small stream where the site discharges its wastewater;
- if all discharged wastewater infiltrates into the ground during the dry season and how much influence the wastewater may have during high flow events; and
- whether the catchment of Voutoumias River is relevant for the site.

Standard criteria and indicators:

Criterion	Indicator(s)
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	2.1.3 Names and location of effluent discharge points, including both water service provider (if applicable) and ultimate receiving water body

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Identified Observation

Observation Number: 0479095/NP/Obs2

Observation:

Until 2016, concentration of nitrates in the water from the factory's wells has been below 6 mg/l, in 2017 and 2018 the reading was between 6 and 7 mg/l and in 2019 further increased to 9.25 mg/l, representing a roughly 50% increase compared to pre-2017 levels. The reading is still below Nestlé's threshold when measures would need to be taken (15 mg/l), and water tested from wells further from the factory did not show an increased concentration of nitrates. Therefore it is likely that this higher reading in 2019 is a result of the sample being insufficiently representative and does not indicate a trend of increase in average nitrate concentration in the aquifer. However, as possible pollution from agriculture is one of the shared water challenges formulated based on stakeholder engagement, in the future the site may consider testing the well water for nitrates more often than once per year, to have a better representativeness of the data.

Standard criteria and indicators:

Criterion	**Indicator(s)**
2.3. Gather water-related data for the catchment: Gather credible and temporally relevant data on the site's catchments […] x Water quality for all sources while considering future physical, chemical and biological quality trends; […]	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 anticipated future changes in water quality

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Identified Observation

Observation Number: 0479095/NP/Obs3

Observation:

The site has collected the data and undertaken analysis to understand the water risk levels in the regions where its main suppliers are located. To advance this work further, embedded water footprint of the main inputs could now be calculated.

Standard criteria and indicators:

Criterion	Indicator(s)
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.	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

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Identified Observation

Observation Number: 0479095/NP/Obs4

Observation:

The shared water challenges and site's risks and opportunities have been identified based on the CRP work in 2016, and the site has worked to better understand and address those challenges and risks. As there is now a better and deeper understanding of the challenges, risks and opportunities, the respective lists could now be updated with more specific wording that would be clearer to the re aders outside the factory.

Standard criteria and indicators:

Criterion	Indicator(s)
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
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.	2.7.1. Prioritized list of water risks facing the site, noting severity of impact and likelihood within a given time frame
	2.7.2. Prioritized list of water-related opportunities for the site
	2.7.3. Estimate of potential savings/value creation

Identified Observation

Observation Number: 0479095/NP/2/Obs5

Observation:

There is some litter in the site's storm water drains that needs cleaning before the rainy season. There is more litter in the nearby dry river bed that can be picked up and carried further by the water during heavy rain events. Although the river bed is outside the site's premises, due to proximity it would demonstrate good stewardship if the site took measures to clean up the litter.

Standard criteria and indicators:

Criterion	Indicator(s)
Related to 2.7. Understand and prioritize the site's water risks and opportunities […].	2.7.2. Prioritized list of water-related opportunities for the site.

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Use of Mark/Logos

Based upon information provided and reviewed during the course of the assessment, the organization does comply with the conditions for use of AWS and ERM CVS marks and logos.

Audit Schedule

The agreed surveillance schedule is: Annual Assessment and Triennial Reassessment

Appendix A. Summary of audit findings

Standard Provision or Requirement	Indicators	Objective Evidence reviewed/Obtained	Status and evaluation
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: x Uphold the AWS water stewardship outcomes (good water governance, sustainable water balance, good water quality status and healthy status of Important Water-Related Areas); x Engage stakeholders in an open and transparent manner; x Strive to comply with legal and regulatory requirements x 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; x Support and coordinate with public sector agencies in the implementation of plans and policies, including working together towards meeting the human right to water and sanitation. x Continually improve and adapt the site's water stewardship actions and plans; x Maintain the organizational capacity necessary to successfully implement the AWS Standard, including ensuring that staff have the time and resources necessary to undertake the implementation; x Support water-related national and international treaties; x 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)	Extract on water stewardship from Korpi website; Leadership commitment in English signed by the factory manager, disclosed on Korpi internet site.	The statement signed by the factory management is in line with the standard's expectations. The formal commitment is disclosed on the factory's website. Based on interviews with the elected representative of the nearby Monastiraki village and a hydrogeologist consultant who has provided consulting to the municipality of Vonitsa, the factory's commitment to water stewardship (just in other words than the formal signed document) has been communicated consistently over the last few years.

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)	Nestlé commitment on water stewardship (worldwide) in the Nestlé environmental policy from 2014.	Nestlé Waters has a common water stewardship policy that is applied worldwide. The commitment effectively signifies that the site upholds this policy.

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	AWS maps Korpi: 1) google earth map showing the site, WWTP, WW discharge, plot boundaries and the four wells K1, K2, K3 and K4; 2) new acquisition boundaries; Storm water drainage map	The site has prepared maps that take into account all requirements of the standard. Since the initial document review, the site has taken significant effort to analyse how the immediate recharge area of its four wells is connected to other aquifers/sub-systems, as the site is located in a carstic region. The maps show the recharge areas of each subsystem, their spatial extent, and the direction of the groundwater flow. The maps are not easy to understand for non-specialists, therefore the site is now working on creating a 3D model to be used for explanations to its stakeholders. These sub-systems fall within the Monastirakiou groundwater system and Vonitsa-Voulkaria groundwater system - those are groundwater bodies identified for the implementation of the EU Water Framework Directive, for which data on quantitative and ecological status is
	2.1.2 Names and location of water sources, including both water service provider (if applicable) and ultimate source water	AWS maps Korpi: 1) google earth map showing the site, WWTP, WW discharge, plot boundaries and the four wells K1, K2, K3 and K4; 2) new acquisition boundaries	
	2.1.3 Names and location of effluent discharge points, including both water service provider (if applicable) and ultimate receiving water body	AWS maps Korpi: 1) google earth map showing the site, WWTP, WW discharge, plot boundaries and the four wells K1, K2, K3 and K4; 2) new acquisition boundaries; 3 and 4) another google earth map showing stormwater discharge and receiving body of WW discharge (drainage 'Dry River');	

	2.1.4 Geographical description or map of the catchment(s)	5) catchment area showing recharge areas of several aquifer layers - separate layers are then presented in the following maps; 6) Synclinal system sub catchment - where wells are located; 7) Korpi anticlinal kakirite system (sub-catchment, where the wells of the municipality are located); 8) Jurassic aquifer system (very deep system that is recharged by the other sub-catchment); 9) Shear zone aquifer system (that recharge monistiraki spring); 10) Transversal aquifer system (higher system, that recharge the others); 11) Shallow aquifer system (that is recharged by all the other system and drained all the water to the see)	available. The site's four wells abstract water from the Korpi synclinal sub-system. Next to the site, a dry riverbed is located, and a valley of a dry stream where the site's wastewater gets discharged (not continuously). The small stream's valley leads to the dry river bed, and this dry river bed leads further downstream into Giourgia (yourya) and Voutoumias. On the map of surface and coastal water bodies in the relevant River Basin Management Plan, the closest river/stream is Voutoumias rema - full code GR0415R000901066N. Based on interviews, the river bed next to the site has a temporary flow only during heavy rain. However, the hydrogeologist investigating the area suggested that further downstream from the site's wastewater discharge point, there is some groundwater discharge feeding the flow. An observation was raised to further investigate if the catchment of Voutoumias river is relevant.
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	A list of stakeholders; CRP meetings tracker; Completed CRP tool from 2016; Presentation by TruBerries of acceptability survey findings in March 2016.	The stakeholder identification and engagement was started in 2016. Initially the site did brainstorming of who are the stakeholders, mapped them, and selected people for interviews. Then filled in the interview report for each stakeholder. The interviews had specific questions about water, asked ratings and comments. Then action plan and challenges were done based on that exercise. So the main basis for shared water challenges is actually the stakeholder interviews. External company TruBerries also did a stakeholder acceptability survey. The questionnaire had specific questions about opinion on water management. High score was found. The stakeholder evaluation will be done again later this year.

	2.2.2 Description of the site's sphere of influence	A scheme with the site's sphere of influence	The scheme was done for the site's stakeholders generally rather than specifically for water stewardship, when the CRP exercise was done in 2016. But it is applicable to water stewardship as well and will be updated following the next round of stakeholder evaluation.
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.	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	English summary of the river basin management plan (RBMP) for Western Sterea Ellada River Basin District, dated Sep 2014. Full Greek version.	RBMP from Sep2014 is still the valid latest plan as newer versions have not been released. The site is in touch with the RBM authority. The site also sought to obtain a management plan or other document for the nearby protected area but the authority directed them to the same RBMP.
	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	Licences for the wells; Permit for the site 2016; copies of legislation relevant to the wells and the WWTP	Legal and regulatory requirements are well understood.

	2.3.3 Catchment water balance by temporally relevant time unit and commentary on future supply and demand trends	Excel sheet '2.3.3 Water balance_Korpi_2019.03.25'; screenshot of the updated water balance; interview with the hydrogeologist from University of Neuchatel	Following the initial document review, the site took a considerable effort to improve its understanding of the water balance of different aquifer layers and how they relate to each other. A hydrogeologist team from the University of Neuchatel has been undertaking a study, including using available data and new field measurements, and is updating the water balance. Based on the interview with the study's team leader, although the exact numbers may change as they refine the model, the conclusion is that the aquifer sub-system where the factory's wells are located has a healthy quantitative status, and the overall connected system including the layer where municipal wells and irrigation wells are located, have a positive balance.
	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 anticipated future changes in water quality	Well water test reports; Water resources review for Korpi factory, April 2018 (done by corporate hydrogeologist); Assessment of water resources of Vonitsa (master thesis by Amira Kraiem Morard), 2010; Map showing chemical status of groundwater bodies in Greece; Excel sheet 'analysis catchment sampling points'; own research on internet of GWB status	The status assigned to GWBs under WFD uses larger groundwater systems than the ones analysed in detail by the site but the layers analysed by the site are located in the Monastirakiou and Vonitsa systems, so these systems are the relevant GWBs for which national data is available. The status of these two GWBs is good. Reports from detailed analysis of samples from the factory's wells show that for most elements the concentration of possible pollutants is below detectable limit. For the nitrates, this year the concentration jumped to 9.25 from usual levels between 5 and 7. Only one sample per year is analysed for nitrates. The level is still below the threshold when Nestlé takes measures to reduce the nitrates concentration in production water (15 mg/l) but the question was whether this may indicate a trend of an increase in nitrates in the aquifer, given that one of the shared water challenges is possible pollution from agriculture. The challenge was formulated based on stakeholder engagement – more on perception rather than evidence. So

			additionally, samples from other points within the catchment (further from the site) were analysed as well and show that nitrates concentration is low. It is therefore reasonable to assume that the high reading of nitrates concentration is a reflection of the sample being not representative. Observation Obs2 was raised to consider analysing more than one sample per year for nitrates.
	2.3.5 Documentation identifying Important Water-Related Areas, including a description of their current status and commentary on future trends	Excel sheet '2.3.5 IWRAs Korpi area'; Korpi springs article on internet; map with protected areas	The site is a bit downstream of the protected area - area protected because of wildlife, where no industrial activity is allowed. What is allowed/not allowed is included in the RBDMP - saw this during the audit. The site approached authorities if there is a specific management plan for the area but were directed only to the RBMP.
	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	Boreholes and springs map; excel 'Municipal infrastructure'; map with municipal infrastructure	Excel sheet on municipal infrastructure was completed by the factory manager based on discussions with the municipality. The infrastructure will change to some extent now that more wells are being built by the municipality to manage seasonal peak of high withdrawals during low recharge.

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	0447-SAF-DOC-11.02-RESPONSE IN EMERGENCY SITUATION	Emergency response plans are adequate.
	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)	Scheme of water mapping on site; graph with water ratio year on year; scheme of storm water drainage; slide with explanation on rainwater and its drainage	Water balance was explained during the site tour. The site continuously monitors its water loss ratio.
	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)	Excel 'Trend of major chemical elements'; 'WWT trend major elements', 'QMS 2018 updated 26.06.2018 final'	There is now flow in the dry stream bed where the site discharges its effluent.
	2.4.4 Inventory of all material water-related chemicals used or stored on-site that are possible causes of water pollution	Excel 'Chemicals inventory'	The site has an inventory of chemicals used or stored on site.

	2.4.5 Documentation identifying existing, or historic, on-site Important Water-Related Areas, including a description of their status	No on-site IWRAs	No on-site IWRAs
	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	Excel '2.4.6 AWS DATA COLLECT revenues - cost'	In a water bottling site, all costs and revenues are related to water, so whilst the exercise was done to try to collect data according to the standard's guidelines, the value of the exercise appears limited to the site.
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.	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	Excel 'Korpi primary inputs updated', request emails and reply emails	For the main suppliers, the site looked where they are located and what is the water risk level using Aqueduct as the source of risk rating. Some suppliers are in high risk, so the site may need to get more information. An observation Obs3 was raised to supplement this analysis with the calculation of embedded water in the production of material for the bottles

	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	Excel 'List of outsourced services'	The outsourced services, such as cleaning, use water that is already accounted for in the site's water usage. No services that would indicate outsources use of water or impact on water elsewhere.
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	Excel 'Shared water challenges updated'	The shared water challenges were formulated based on the stakeholder engagement (CRP) process in 2016. Since then, the understanding of the shared water challenges has improved and the formulation should be updated - Obs4 was raised.
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.	2.7.1 Prioritized list of water risks facing the site, noting severity of impact and likelihood within a given time frame	Excel 'Site water risks updated'	Site water risks have been formulated based on the shared water challenges. The wording should be updated - see Obs4

	2.7.2 Prioritized list of water-related opportunities for the site	Excel 'List of opportunities'	Opportunities are also formulated in relation to the shared water challenges and risks. Obs4 is applicable to opportunities as well. Obs 5 raised because of seen litter in the site's storm water drains and in the nearby dry river bed, is also related to the opportunities - it would be an opportunity for the site to demonstrate water stewardship.
	2.7.3 Estimate of potential savings/value creation	Excel 'Savings value creation'	The savings and value creation have been formulated in rather generic ways which reflect understanding at the time when the challenges were formulated.
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	Procedure on compliance evaluation. List of legal requirements and status of compliance	The site has a functioning compliance evaluation system
3.2 Create a site water stewardship strategy and plan: Develop an internally available water stewardship strategy and plan for the site	3.2.1 Available water stewardship strategy	Water stewardship strategy for the site signed in March 2018	A short strategy listing the key goals stemming from shared water challenges, is formulated.

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.	3.2.2 Available plan that meets all component requirements and addresses site risks, opportunities and stakeholder shared water challenges	Water stewardship plan. CRP excel file that is a combination of the plan and the tracker.	The AWS action plan is like an extract from the CRP action plan but linked to the challenges and with the addition of budget, way of measurement - because CRP tool did not have those additional points required for the water stewardship plan. The actions address shared water challenges and site risks.
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	Emergency response procedure. Water resources contingency plan. List of issues/scenarios and testing of preparedness.	The site already has a functioning response plan. The shared water challenges and site risks are of a type that did not need changes to the site's emergency response or water resource contingency plans.
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.	3.4.1 Documented evidence of communicating the site's plan to the relevant catchment authority/agency	Email from the site manager to the water department.	A year ago the factory manager had a meeting with the head of the water department - presented the action plan and the presentation to stakeholders. Now recently sent an email with the plan, actions done, and a follow up call whether the authority had any questions or comments.

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	Excel sheets tracking compliance with national regulations.	The site has an effective tracking of compliance to legal and regulatory requirements. No issues identified
	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.		There is no issue with unmet human rights to safe drinking water and sanitation in the catchment
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.	4.2.1 Measurement-based evidence showing that targets have been met	Excel sheets 'Energy and Water Reduction Forecast and roadmap 2018_2020' and 'Water ration 2019 YTD'. List of projects since 2011 implemented to reduce factory's water use. Awareness poster on water.	The water use ratio was reducing year on year except 2017 and 2018 when it went slightly up due to the change in CIP process (and chemicals used) and the additional testing needed for that. The target for this year would not be met and the target has been adjusted in mid-year because production is lower than was forecasted. This water loss ratio is very good for a water bottling site.
	4.2.2 (Water scarce catchments only) Evidence of continual decrease or best practice		The groundwater system has a good quantitative status.

	4.2.3 (Sites wishing to increase withdrawals in water scarce catchments only) Evidence of no net increase in water scarcity		Not applicable for this catchment.
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	Well test reports. Excel 'Trend of major chemical elements 2013-2019'	The site's water quality = the water quality in the wells. There are no specific targets set for water quality. The measures relate to monitoring water quality in the groundwater system to be able to notice of quality starts to decrease. See Obs2 on the frequency of testing nitrates in the well water.
	4.3.2 (Water quality-stressed catchments only) Evidence of continual improvement or best practice	Same evidence as for indicator 2.3.4 above	The monitoring data does not indicate water quality stress, and the groundwater status is good for the Monastirakiou and Vonitsa groundwater systems.
	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	Same evidence as for indicator 2.3.4 above	Not applicable for this catchment.

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.	4.4.1 Documented evidence showing that targets have been met		No targets related to important water related areas had to be set for the catchment.
	4.4.2 (Degraded Important Water-Related Area catchments only) Evidence of continual improvement or best practice		No targets related to important water related areas had to be set for the catchment.
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	4.5.1 Documented evidence of the site's ongoing efforts to contribute to good catchment governance	CRP meetings tracker. Presentation to stakeholders that shows public disclose of working with the municipality. Interviews with the elected representative of Monastiraki village and the consultant hydrogeologist who sometimes consults municipality.	The site has been cooperating with the municipality on improving the understanding about the groundwater status, including sharing data and donating monitoring equipment, and in developing plans how to improve management of water abstraction.
	4.5.2 (Weak water governance catchments only) Evidence of continual improvement or best practice		See above.
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		The site's suppliers are not located in the catchment. The service providers use the water at the site.
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		No issues with WASH at the site.

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		The site does not share water infrastructure with other owners. However the site is continually working with the municipality, which owns all water infrastructure.
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.	5.1.1 Post-implementation data and narrative discussion of performance and context (including water risk)	Email from Water certification manager for Europe on 05 July 2019 'CRP and AWS Q2 2019 South Europe without Italy'. CRP excel file that is a combination of the plan and the tracker.	CRP tracking is also used for AWS tracking as AWS is like part of CRP. Quarterly reports from the regional water stewardship manager by email about performance - going through key issues. Monthly skype calls with sites to track the progress - go action by action. Reviewed the latest iteration of the CRP action plan and tracker - shows effective tracking. At the end of the year the site updates the plan for next year.
	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)	Water stewardship plan	The plan include costs of measures taken and the description of their benefit.
	5.1.3 Updated data for indicator 2.4.7 on catchment shared value creation based upon the actions outlined in 3.2	Excel 'Shared value creation'	Value creation has been formulated in a descriptive way but suitable at this stage.
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)		No incidents have happened at least for the last 5 years.

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	Presentation to stakeholders. CRP interview reports (post-evaluation) with several stakeholders. Video from the World Water Day event.	Positive feedback. Some asked what they could do. Water division was especially surprised when the site sent a table showing how some of the site's activities match or help achieve some measures in the RBDMP. World Water Day event got a Greek award - it was in the news.
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	CRP tool	As water stewardship actions were started several years ago, there is evidence of the plan and its actions getting updated.

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	Factory website	The site's website states positions with responsibilities, without names. As the factory manager participates actively in all stakeholder relations, additional disclosures on governance are not needed.
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.	6.2.1 Disclosed summary of site's water stewardship results	Presentation to stakeholders	The presentation gives an overview of the site's performance.
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.	6.3.1 Disclosed and publicly available description of shared challenges and summary of actions taken to engage stakeholders (including public-sector agencies)	Presentation to stakeholders	The presentation includes shared water challenges and actions to address them.

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		There were no violations
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	Water awareness poster. Presentation about AWS to factory staff. Pictures from the event.	The awareness efforts at the site are appropriate.