Alliance for Water Stewardship

Audit Report for Nestlé Waters Egypt
Banha Factory

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

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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 Egypt Benha
AWS Reference Number	AWS-010-INT-CAB-00-05-0004-0038
Client AWS Representative/Group Manager (Role/Name/Contact info)	Mostafa Amer, Nestle Waters Egypt
Audit Team (Role/Name)	Lead Auditor: Warrick Stewart, SCS
	Tech Auditor: Owen Wentzel, SCS
	Local Auditor/Translator: Hussein Gawwad
	Team Auditor: Rae Mindock, SCS
Audit dates (DD-DD Month YYYY)	July 16/17 2019
Audit Location (main site being audited)	Banha, Kafar El Arabein, Kalyoubia, Banha, Egypt
Date(s) of previous audit (if applicable)	N/A
Findings from previous year	☐ YES, see tab 9
SCS Certificate number (if applicable)	AWS-010-INT-CAB-00-05-0004-0038
Expiry date of previous certificate (if applicable)	N/A

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 provide a description of the group structure and relationships	
Description of Operations	

The Banha Factory is a water bottling facility, producing bottled mineral water products under the brand name of Nestle Pure Life (NPL) and Baraka . The factory has seven production lines, including 2 high speed lines. It produces a variety of different bottle types including 0.33L, 0.6L, 1.5L and 6L sizes. One of the seven lines produce sparkling water, although it shares a line end with Line 2 (still water).

Water is currently acquired through two operational underground wells. A third, currently non-operational well, is located approximately 500m from the factory. One well provides water solely for operational purposes (e.g. sanitation, factory processes etc.), and the other provides water solely for bottling of water. Municipal water is provided and used on site is for fire fighting purposes.

Description of the catchment in which the client operates:

The Banha plant is located within the Nile River Delta, 47km north of Cairo and 126km south of the Mediterranean Sea. The main aquifer in the project area is the Nile Delta aquifer. In the project area, the Nile aquifer can be divided into two main horizons separated by a heterogenous lower permeability layer.
Groundwater recharge in the project area is occurring from deep percolation from excess irrigation water and seepage from the river branches (Damietta branch for the project area), canals and drainage systems. Downward leakage occurs due to water applied for irrigation and canal infiltration . Rainfall amount in the area is so little that groundwater recharge from rainfall is considered as negligible.

Groundwater discharge into the drainage system and surface water features is mainly occurring in the northern part of the delta, outside the project area. Groundwater discharge from the Nile aquifer into the Moghra aquifer is occurring in the western fringe of the Delta, outside the project area. In the project area, groundwater discharge is mainly occurring via the abstracting wells.

Summary of shared water challenges:

Shared water challenges are catchment water related issues shared by the site and stakeholders. A prioritized list of shared water challenges addressing the outcomes was provided. Shared water challenges in the catchment include waste-water discharge concerns (water borne-diseases, odours, drinking water impacts, drain leaks, open/exposed drains, lack of adequate piping from homes, blocked drains and associated spills) and drinking water related challenges for communities (limited clean drinking water and the over-use of water by communities).

Audit Attendance

Guidance:

Audit Attendence

Attendee Name	Role/Title	*Mark attendance with an 'x' as appropriate*			
		Opening meeting	Document review	Facility Inspection	Closing meeting
Warrick Stewart	SCS Lead Auditor	x	x	x	x
Owen Wentzel	SCS Auditor	x	x	x	x
Hussein Gawwad	SCS Groundwater Specialist Translator	x	x	x	x
Mostafa Amer	WR and WT Manager	x	x	x	x
Aja Hegazy	Factory Hygienist				x
Manar Mohamed	Lab Supervisor	x			x
Susan Aly	Production Manager	x			x
Mohammed Ghobara	Packaging Superintendent	x			x
Radwa Amer	CSR Manager	x	x	x	x
Rae Mindock	SCS Program Manager		x		x

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Surveillance audits shall cover at a minimum those requirements highlighted in light green

Core / Points	Requirement	Indicators	Conforms Yes	Conforms No	Conforms N/A	Objective Evidence Reviewed / Finding	Allocated Points
Step 1: COMMIT - Commit to being a responsible water steward							
Step 1 ensures that there is sufficient leadership support to enact the rest of the criteria within the Standard. This step also relates to commitments to legal/regulatory compliance and rights- related issues, which underpin water stewardship.							
Core	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,	1.1.1 Signed and publicly disclosed statement that explicitly covers all requirements (see details in Criterion 1.1).	Yes			A leadership commitment statement signed by the factory manager containing the elements described in this criterion was provided.	
Core	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)	Yes			Nestlé's corporate water stewardship policy "Nestlé and Water: Sustainability, Protection, and Stewardship" extensively discusses Nestlé's commitment to sustainable water use. The policy is publicly available on the Nestlé website.	
Step 2: GATHER AND UNDERSTAND – Gather data to understand shared water challenges and water related risks, impacts and opportunities							
Step 2 ensures that the site gathers data on its water use and its catchment context and that the site employs these data to understand its shared water challenges as well as its contributions (both negative and positive) to these challenges and to water-related risks, impacts and opportunities. This information also informs the development of the site's water stewardship plan (Step 3) and guides the actions (Step 4) necessary to deliver upon the commitments (Step 1).							
Core	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	Yes			A map of the site was provided. The map includes the property boundaries of the factory, deep wells and the wastewater discharge point. The map also shows the third deep well southeast and adjacent to the factory.	
		2.1.2 Names and location of water sources, including both water service provider (if applicable) and ultimate source water	Yes			A map with the names and location of water sources was provided. The main source of water is from the Nile River Aquafer (Damietta Branch, Altawfiqy Branch and Mois Branch) via Factory Deep Wells 1,2 and 3.	
		2.1.3 Names and location of effluent discharge points, including both water service provider (if applicable) and ultimate receiving water body	Yes			The Benha factory and water sources are located to the east of Benha near Kafr El arbien, East Nile delta region. It is bounded from the south and east by the Bahr Muways and from the west by the Rayah El Tawfiki and from the north by the Al Azizia drain. The industrial waste treatment works flows to the Azizia drain.	
		2.1.4 Geographical description or map of the catchment(s)	Yes			Maps were provided, including details of hydrogeology of catchment. The map and description of the geology and catchment were provided giving all the information required. The main source of water is from the East Nile Delta region. A Water Hydro study was conducted by local authority RIGW funded by Nestlé covering details related to catchment recharge, discharge, effluent streams and geographical description of catchment. ANTEA report on hydrology was reviewed and included details description of catchment.	
Core	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	Yes			Stakeholders are identified in the Nestlé CRP and associated water-related challenges including evidence of a process to identify stakeholders and their water-related challenges. The Community Relations Process plan listing the site's engagements with stakeholders. Stakeholder Mapping includes stakeholder lists, water-related challenges and some evidence of meetings. A list of on-going and upcoming engagements with stakeholders providing the site approach to water-related challenges.	
		2.2.2 Description of the site's sphere of influence	Yes			Information on sphere of influence was provided and reviewed. Stakeholders are related to the site's catchment and identifies the stakeholders' ability to influence or be influenced.	
Core	2.3 Gather water-related data for the catchment Gather credible and temporally relevant data on the site's catchment: - 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; - Water balance for all sources while considering future supply and demand trends; - Water quality for all sources while considering future physical, chemical and biological quality trends; - Important Water-Related Areas, including their identification and current status, while considering future trends;	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		No		Information was provided but did not include a summary of catchment management plans. An Arabic document was provided, providing information on a public led initiative of a project in local village. **Minor NC 2019.01 was issued.** There was a lack of water related data for catchment. The catchment is defined in the hydrogeological map of the Benha Factory. The Groundwater Modeling Study prepared by Antea Group provides information on groundwater quality. Additional regional data was provided but did not include an evaluation and comparison.	
		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	Yes			Documentation was provided for the Effluent Drain permit, Well License documents, Egyptian Standard for bottled packaged drinking water document, Summary of Environment Law of Egypt compliance, and evidence of compliance of with waste water characteristics. Information was provided on customary water rights or water use rights. **OBS 2019.01 was issued.** Nestlé should provide a brief summary statement on customary water rights or water use rights in water-related legal and regulatory requirements.	
		2.3.3 Catchment water balance by temporally relevant time unit and commentary on future supply and demand trends.	Yes			Water balance for the site and at catchment-level was provided which includes the water inflow and outflow values based on available data.	

		2.3.4 Appropriate and credibly measured data to represent the physical, chemical and biological status of the catchment's water source(s) by temporally relevant time unit, and commentary on any anticipated future changes in water quality.		No		A list of wells in the catchment was provided and data from canals was provided to represent the catchment water sources. Trending of water quality sources was not evaluated or compared to historical data. **Minor NC 2019.02 was issued.** There was not sufficient data presented to evaluate trending. If data is not available for the catchment, that should be stated, with how the site will characterize the catchments water sources.	
		2.3.5 Documentation identifying Important Water Related Areas, including a description of their current status and commentary on future trends	Yes			IWRAs have been identified by Nestle as the Damietta Nile Branches and provided a description of their water related issues. There was no commentary on future trends. **Observation 2019.02 was issued.** Additional evaluation of IWRAs should be conducted to provide details of the IWRAs as related to the catchment. Information on future trends expected for IWRAs should be discussed.	
		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	Yes			The Factory does not rely on municipal water. A document detailing sewage infrastructure plans in a local village, Jamjara was provided. No addtional reports or plans on water-related infrastructure, including current and projected need of water users in catchment, and exposure to extreme events.	
Core	2.4 Gather water-related data for the site Gather credible and temporally relevant data on the site's: ▯ Governance (including water stewardship and incident response plan); ▯ Water balance (volumetric balance of water inputs and outputs);	2.4.1 Copies of existing water stewardship and incident response plans	Yes			Documentation was provided (SHE document) which addresses the Incident Response Plan requirements.	
		2.4.2 Site water balance (in mm^3 or m^3) by temporally relevant time unit and water-use intensity metric (mm^3 or m^3 per unit of production or service)	Yes			Nestlé prepared and provided water maps containing inputs and outputs of water at this facility. Data showing monthly water inflows, outflows, and losses were reviewed. The site utilizes a Water Withdrawal Ratio (WWR) to evaluate efficiency, measuring Liters of water used to produce a Liter of product. As of 2018, plant WWR is operating at an efficiency of 1.586 L/L. . Documented water extraction annually demonstrates a reduction in extraction.	
		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)	Yes			Water sources undergo the standard required annual water quality testing performed by third party laboratories. Permit on discharge chemical values provided from the Ministry of Health, as well as various internal results. The water analysis of waste water received indicated that Benha factory is within all limits set by the Ministry of Health.	
		2.4.4 Inventory of all material water- related chemicals used or stored on- site that are possible causes of water pollution	Yes			A list of chemicals used in the site was provided.	
		2.4.5 Documentation identifying existing, or historic, onsite Important Water-Related Areas, including a description of their status	Yes			There were no on-site IWRA's identified.	
		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	Yes			Water-related costs for 2018 provided but did not provide the indicator requirements. A list of actions and costs related to social and environmental efforts was provided. Social and environmental value data was described.	
Core	2.5 Improve the site's understanding of its indirect water use Identify and continually improve the site's understanding of: ▯ 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; ▯ 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	Yes			Document showing site's monthly water inputs for 2017 and 2018 for indirect water uses. Indirect water use is a very small percentage of direct water use.	
		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.	Yes			Documentation provided shows values of water consumptions and availability. Document showing site's outsourced water consuming services. Chemical and biological analyses of site's water are documented..	
Core	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	2.6.1 Prioritized and justified list of shared water challenges that also considers drivers and notes related to public-sector agency efforts	Yes			A prioritized list with rationale of shared water challenges was provided and reviewed. Shared water challenges and drivers of challenges are recorded, as is the lack of public-sector agency effort to resolve water quality issues.	
Core	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,	2.7.1 Prioritized list of water risks facing the site, noting severity of impact and likelihood within a given time frame	Yes			A prioritized list of water risks was provided and reviewed. Water risks matched water challenges.	
		2.7.2 Prioritized list of water-related opportunities for the site	Yes			Some opportunities identified in SWOT, but not prioritized. Project prioritization lists projects (opportunities) for water savings within factory.	
		2.7.3 Estimate of potential savings/value creation	Yes			The project prioritization lists projects (opportunities) for water savings within factory with potential water savings.	

Step 3: PLAN – Develop a water stewardship plan

Step 3 focuses on how a site will improve its performance and the status of its catchment in terms of the AWS water stewardship outcomes. Step 3 needs to explicitly link the information gathered in Step 2 to the performance noted in Step 4 by describing who will be doing what and when. The monitoring methods in Step 5 should also reflect the plan.

Core	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	3.1.1 Documented description of system, including the processes to evaluate compliance and the names of those responsible and accountable for legal compliance	Yes			Document that outlines the factory Operational Master Plan with roles and responsibilities was reviewed. Personnel hierarchy chart is also provided.	
Core	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	3.2.1 Available water stewardship strategy	Yes			A water stewardship strategy statement was provided and reviewed. It is a high level document stating the overall strategy is in alignment with the AWS requirements.	
		3.2.2 Available plan that meets all component requirements and addresses site risks, opportunities and stakeholder shared water challenges	Yes			Water stewardship plan documents specific actions, time-frames, responsible parties and status of implementation, including targets, timelines, Responsible party (but not accountable party). Publicly Lead Initiatives documents refers to Stakeholder Engagement as NA for some tasks. At a minimum Stakeholder Engagement includes sharing information on water-related Factory improvements.	
Core	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	Yes			SHE plan provided information on potential factory emergencies and some broader water-related risks facing the site, including flooding. Infrastructure and operational procedure improvements at maintenance area for forklifts and fuel dispensing area where small-scale spills have occurred are being addressed as future work activities.	
Core	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	Yes			Ministry of Health is responsible for Water Supply and Sanitation, which is implementation by the state Water Company (potable water and sanitation). Ministry of Irrigation is responsible for irrigation canals. Documented communication was provided and reviewed.	
Step 4: IMPLEMENT – Implement the site's stewardship plan and improve impacts							
Step 4 is intended to ensure that the site is executing the plan outlined in Step 3, mitigating risks and driving actual improvements in performance.							
Core	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.	4.1.1 Documentation demonstrating compliance	Yes			The daily permitted extraction rate was checked against the actual extraction rate for wells 1 and 2 for the period from January 1, 2015 through May 31, 2019 with some exceedances. The groundwater abstractions from well 2 are in compliance if the permitted and actual extractions are annualized.	
		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.	Yes			Efforts were made to provide access to safe drinking water at schools, but the Ministry of Health declined these efforts.	
Core	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	4.2.1 Measurement-based evidence showing that targets have been met	Yes			The site has improved its water efficiency as per its targets. The water trends include: WWR of 1.57 for 2018, 1.49 projected for 2019.	
		4.2.2 (Water scarce catchments only) Evidence of continual decrease or best practice 4.2.3 (Sites wishing to increase withdrawals in water scarce catchments only) Evidence of no net increase in water scarcity	Yes			The Site is not within a water scarce catchment.	
		4.2.3 (Sites wishing to increase withdrawals in water scarce catchments only) Evidence of no net increase in water scarcity	Yes			The Site is not within a water scarce catchment.	
Core	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	4.3.1 Measurement-based evidence showing that targets have been met	Yes			Current focus is on meeting legal requirements and internal Nestlé standards, which have been met.	
Core	4.4 Maintain or improve the status of the site's Important Water-Related Areas:	4.4.1 Documented evidence showing that targets have been met.	Yes			No on-site IWRAs are present at the Benha site.	
Core	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	Yes			Various efforts have been made and documented, including a wide-range of notable actions on health and education (associated with water issues) which are national priorities.	
Core	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	Yes			A list of Primary Input Providers and Outsourced Services was prepared. Water usage data have been compiled for the majority of the Primary Input Providers and the top Outsourced Services.	
Core	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	Yes			NWNA uses a self-assessment tool at each site to review access to drinking water, sanitation and hygiene awareness (WASH). A list of actions to provide workers with WASH on-site and at home was provided. **OBS 2019. 03 was issued.** Nestle should enable access to WASH facilities in a more formal manner when delivery truck drivers are on site, or parked outside the site waiting to make collections.	
Core	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	Yes			The Evidence indicated there may be concerns with shared water related infrastructure. Shared-water infrastructure, specifically working Benha officials responsible for providing water quality for the has been identified. **OBS 2019.04 was issued.** The Site should maintain communications and discussions regarding shared water related infrastructure with appropriate individuals.	
Step 5: EVALUATE - Evaluate the site's performance							
Step 5 is intended to review performance against the actions taken in Step 4, learn from the outcomes – both intended and unintended – and inform the next iteration of the site's water stewardship plan. The expectation is that such an evaluation takes place at least annually, with more frequent evaluation encouraged as feasible.							

Core	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: ▯ 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)	Yes			Performance has been tracked for water ratio and abstraction, but additional evaluation on risks and water stewardship outcomes should be included. **OBS 2019.05 was issued**. Evaluation of risks and benefits should be provided.	
		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)	Yes			See 5.1.1	
		5.1.3 Updated data for indicator 2.4.7 on catchment shared value creation based upon the actions outlined in 3.2	Yes			See 5.1.1	
Core	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	5.2.1 Documented evidence (e.g., annual review and proposed measures)	Yes			The Emergency Response Plan addresses various key risks appropriate to the site.	
Core	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	Yes			A summary of Stakeholder interviews was provided, but did not include information regarding the site's water-related performance to date was discussed. **OBS 2019.06 was issued.** WWR's for the Site was shared, water related performance beyond WWR was not included.	
Core	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			N/A	This is the initial assessment, therefore this indicator does not apply for this initial round of standard implementation.	
Step 6: COMMUNICATE & DISCLOSE – Communicate about water stewardship and disclose the site's stewardship efforts							
Step 6 is intended to encourage transparency and accountability through communication of performance relative to commitments, policies and plans. Disclosure allows others to make informed decisions on a site's operations and tailor their involvement to suit.							
Core	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	Yes			The Factory posts the factory organization chart in the entry of the factory floor where it will be observed the most by staff and visitors. The organization chart includes the staff and relevant responsible personnel for water-related laws and regulations. Site presentations include information on the AWS International Water Stewardship Standard	
Core	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		No		The Stewardship Plan provided in 3.2 indicates tasks are in progress or have been completed, but no documentation provided that discloses a summary of the site's water stewardship results. **Minor NC 2019.09 was issued.** Minimal information on the Stewardship Plan results, namely WWRs was disclosed.	
Core	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)	Yes			Disclosed and publicly available description of shared challenges and summary of actions taken to engage stakeholders has been limited to efforts to local efforts. **OBS 2019.07 was issued.** The disclosure was limited to a small number of actions and does not reflect the suite of shared water challenges.	
Core	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	6.4.1 Available list of water-related compliance violations with corresponding corrective actions	Yes			No violations identified by competent authorities were documented. No violations were documented by Nestlé. Daily exceedances for Well 2 were identified during the audit although the permit is evaluated on an annual basis which has not been exceeded.	
Core	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	Yes			Signed sheets for the plantwide training were provided.	

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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 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 (90 calendar Days)	Root Cause Analysis and Corrective Action Taken

NC #	Section #	Minor – Detail on Non Conformance	Due Date (XX calendar Days)	Root Cause Analysis and Corrective Action Taken
2019.01	2.3.1	**Minor NC 2019.01 was issued.** The catchment is defined in the hydrogeological map of the Benha Factory. The Groundwater Modeling Study prepared by Antea Group provides information on groundwater quality. Additional regional data was provided but did not include an evaluation and comparison.	1/28/2020	**Root Cause Analysis:** Documentation was provided in multiple reports. **Corrective Action:** The regional data will be summarized and comparisons will provided.
2019.02	2.3.4	**Minor NC 2019.02 was issued.** There was not sufficient data presented to evaluate trending. If data is not available for the catchment, that should be stated, with how the site will characterize the catchments water sources.	1/28/2020	**Root Cause Analysis:** Limited regional information was provided to the audit team. **Corrective Action:** Additional information will be provided, as available, and reviewed to provide trending information.

2019.03	6.2.1	Minor NC 2019.09 was issued. Minimal information on the Stewardship Plan results, namely WWRs were disclosed to Stakeholders.	1/28/2020	**Root Cause Analysis:** Disclosure was focused on sharing the WWR value for the Site. **Corrective Action:** Site stewardship extends beyond the WWR value, additional information will be provided in future stakeholder disclosures.

OBS #	Section #	Observation – Detail on Opportunity for Improvement	Due Date	Corrective Action Taken
2019.01	2.3.2	OBS 2019.01 was issued. Nestlé should provide a brief summary statement on customary water rights or water use rights in water-related legal and regulatory requirements.	1/28/2020	Note: We understand the observation and will take the advice under consideration. No Corrective Action Plan required.
2019.02	2.3.5	Observation 2019.02 was issued. Additional evaluation of IWRAs should be conducted to provide details of the IWRAs as related to the catchment. Information on future trends expected for IWRAs should be discussed.	1/28/2020	Note: We understand the observation and will take the advice under consideration. No Corrective Action Plan required.
2019.03	4.7.1	OBS 2019. 03 was issued. Nestle should enable access to WASH facilities in a more formal manner when delivery truck drivers are on site, or parked outside the site waiting to make collections.	1/28/2020	Note: We understand the observation and will take the advice under consideration. No Corrective Action Plan required.
2019.04	4.8.1	OBS 2019.04 was issued. The Site should maintain regular communications and discussions re: shared water related infrastructure with appropriate individuals.	1/28/2020	Note: We understand the observation and will take the advice under consideration. No Corrective Action Plan required.
2019.05	5.1.1	OBS 2019.05 was issued. Additional evaluation of risks/benefits should be conducted.	1/28/2020	Note: We understand the observation and will take the advice under consideration. No Corrective Action Plan required.
2019.06	5.3.1	OBS 2019.06 was issued. WWR's for the Site was shared, water related performance beyond WWR should be included.	1/28/2020	Note: We understand the observation and will take the advice under consideration. No Corrective Action Plan required.
2019.07	6.3.1	OBS 2019.07 was issued. The disclosure was limited to a small number of actions. Nestlé should expand disclosure to reflect the suite of shared water challenges.	1/28/2020	Note: We understand the observation and will take the advice under consideration. No Corrective Action Plan required.

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/Continued 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:	**Nicole Munoz, SCS Program Manager** 	
	Technical Review by:	**Nicole Munoz, SCS Program Manager** 	
	Date of decision:	3 December 2019	
	Surveillance schedule:	**Next audit is scheduled for: July 2020 to November 2020**	