Alliance for Water Stewardship

Audit Report - Nestle Waters North America, Inc.
Pasadena, TX Water Bottling Facility

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

Report Issued on November 7, 2019

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Introduction to the Alliance for Water Stewardship

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

Assessment Information:

Client Name	Nestlé Waters North America, Inc. - Pasadena, TX
AWS Reference Number	AWS-010-INT-SCS-00-01-0004-0098
Stakeholder Notification	August 16, 2019 AWS and SCS Website, Houston Chronicle, Pasadena Citizen
Client AWS Representative/Group Manager (Role/Name/Contact info)	Brandon Kienenberger, G.I.T. NWNA, Sustainability Analyst
Audit Team (Role/Name)	Lead Auditor: Rae Mindock, SCS
	Team Auditor: Isabella Polenghi-Wood
	Team Auditor: Shana Golden, SCS
Audit dates (DD-DD Month YYYY)	September 17-19, 2019
Audit Location (main site being audited)	Nestle Waters North America (NWNA) Pasadena, TX Facility 10525 Red Bluff Rd, Pasadena, TX 77507
Date(s) of previous audit (if applicable)	
Findings from previous year	☐ YES, see tab 9
SCS Certificate number (if applicable)	
Expiry date of previous certificate (if applicable)	

Scope of Audit (check all applicable boxes)

The AWS International Water Stewardship Standard Version V1.0 April 8th 2014

Initial audit	☑ YES
Surveillance audit	☐ YES
Re-certification audit	☐ YES
RE-evaluation audit	☐ YES
Single-site audit	☑ YES
Multi-site audit	☐ YES, see tab 3
Group audit	☐ YES, see tab 3
If yes, please description of the group structure and relationships	

Description of Site and Operations

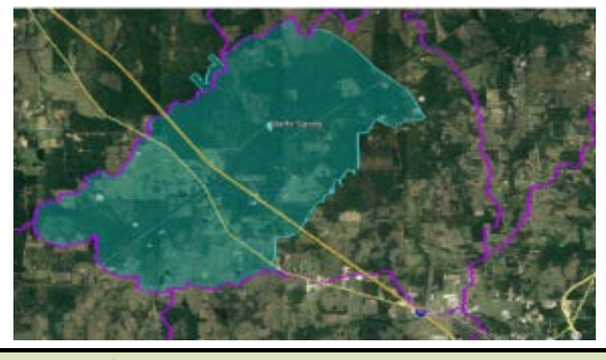
The NWNA Pasadena plant is a water bottling facility, producing bottled water products under the brand names of Ozarka Brand 100% Natural Spring Water (Ozarka) and Nestlé Pure Life Water (NPL). The factory produces 500 ml PET bottles from three bottling lines. Water for the bottling facility comes from Moffit Spring (Ozarka) and Southeast Water Treatment Plant (NPL). The water sources and discharges are within the Pasadena Factory AWS and Moffit Spring Catchments.

Description of the catchment in which the client operates:

The Pasadena, TX plant is located in the Clear Creek-Frontal Galveston Bay Watershed. The Plant is located in the Pasadena Factory Catchment encompassing approximately 191,000 acres. The plant receives water from the Southeast Water Treament Plant and Moffit Spring (located north of Houston). The Moffit Spring Catchment encompasses 23,000 acres and is defined by portions of two contigous sub-water sheds. The Catchments for both water sources are shown below.

Pasasdena Factory AWS Catchment includes the factory, Southeast Water Gulf Coast Waste

Moffit Spring Catchment
Owned property within NWNA administrative and management control.
Both the upgradient and some downgradeient extent of Nelson Creek is included in the catchment.



Summary of shared water challenges and stakeholder engagement:

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. The shared water challenge that was identified and had the highest priority was Public / Consumer Education with spring tours, factsheet, scholarship funding and consistent website updates provided per the Water Stewardship Plan. Other shared water challenges include Water Quantity, Water Quality and Water Efficiency.

Stakeholder engagement was documented during auditor interviews with The Houston Food Bank and Pasadena Chamber of Commerce about NWNA efforts on Public/Consumer Education and WASH contributions Also, the Bluebonnet Groundwater Conservation District and The Meadows Center for Water and the Environment at Texas State University-San Marcos confirmed NWNA actions taken regarding preservation of water quantity and good water governance.

Audit Attendance

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

Audit Attendance	*Mark attendance with an 'x' as appropriate*			
Title/Name	**Opening meeting**	**Document review**	**Facility Inspection**	**Closing meeting**
Plant Manager	x	x	x	x
Natural Resources Manager	x	x	x	x
Sustainability Analyst	x	x	x	x
SHE & TPM Manager	x	x	x	x

Additional information on audit attendance

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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	1.1.1 Signed and publicly disclosed statement that explicitly covers all requirements (see details in Criterion 1.1).	Yes			A pledge was reviewed, signed by the site factory manager, containing all elements described in this criterion.	
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 waterrelatedrisks, 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							
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, the spring water unload station and tanks, city water pipelines, and the wastewater discharge point. The map also shows the storm water detention pond adjacent and to the west of the facility.	
		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 locations of water sources was provided. The Pasadena facility receives water from: - Moffit Spring (~44% trucked) - Southeast Water Treatment Plant (~56%, piped). City of Houston surface water supply sources are also shown on a map with details on withdrawal quantities.	
		2.1.3 Names and location of effluent discharge points, including both water service provider (if applicable) and ultimate receiving water body	Yes			Site wastewater is comingled with other operations in the Bayport Business Park and conveyed to the Gulf Coast Waste Disposal Authority Bayport Facility. That facility discharges to the Bayport Channel and ultimately to Galveston Bay. Stormwater is directed offsite into stormwater spillways and retention ponds.	
		2.1.4 Geographical description or map of the catchment(s)	Yes			A map of the site catchment was provided (comprised of two sub-catchments). The catchment area for the Pasadena facility is approximately 191,000 acres. The catchment area contains the: factory, Southeast Water Treatment Plant and Gulf Coast Waste Disposal Bayport Facility. A map was also provided of the separate Moffit Spring sub-catchment, which encompasses an area of approximately 23,000 acres. The sub-catchment is defined by portions of two contiguous sub-watersheds containing - All owned property within NWNA administrative and management control - Up-gradient reach of Nelson Creek; and - Down-gradient reach of Nelson Creek through the confluences of Gum Branch, Crabb Creek, Post Oak Branch and Possum Branch[2].	
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			The stakeholder map created during the Nestlé Community Relations Process (CRP2) was reviewed. Stakeholders identified include Johnson Development, Armand Bayou Nature Center, DeWayne Hall (building owner), Pasadena Chamber of Commerce, Pasadena Food Bank, school districts, community outreach programs and regional state representatives. The stakeholders interviewed were aware of NWNA, including issues of water usage/operations in the area. NWNA Pasadena supports the "Every Drop Counts" scholarship and the River, Lakes, Bays N Bayous Trash Bash. The Chamber featured "Nestlé Waters Seeking AWS Certification" in their Chambergram.	
		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;	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	Yes			A Catchment Plan Review Summary was provided for the Pasadena site, including a list of specific issues, catchment plans, public policy goals, and site level opportunities. Appropriate time frame is provided, as applicable.	
		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			A list of federal, state, local permits and regulatory requirements was provided, including permits issued by the EPA, the public health department, TPDES and TCEQ. List of relevant and applicable legal and other requirements were also provided.	

		2.3.3 Catchment water balance by temporally relevant time unit and commentary on future supply and demand trends	Yes			A catchment water balance with precipitation, point source flows, subsurface flow, runoff, and ET was provided as: - 30-year annual averages inflow and outflow values. - 30-years monthly average water fluxes In addition, a water balance for the City of Houston was provided, which includes average monthly water demand data and water supply values for the period between 2009 and 2013. A more recent water balance and future projections on population, annual water demand and supply data are publicly available on the Texas State Water Plan website. A water balance is presented for the Moffit spring catchment. It includes annual values from 2003 to 2018 for precipitation, ET, recharge, runoff, groundwater flows out, and NWNA productions.	
		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	Yes			Moffit Spring water undergoes the standard State required annual water quality testing performed by third party laboratories. In addition NWNA performs quarterly, monthly, and weekly water quality testing on additional constituents and parameters. City of Houston water is treated according to federal and state standards to remove any possible harmful contaminants. Trending of both water quality sources is evaluated annually and compared to historical data and water quality goals. Discussion on water quality sources was verbally provided to indicate that no changes are anticipated.	
		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 NWNA and described along with a description of their water related issues. IWRAs include Armand Bayou Nature Center, Nassau Bay Peninsula Wildlife Park, Galveston Bay, Clear Lake, Mud Lake, Taylor Lake, Clear Creek.	
		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			A list of publicly available reports/data of water-related infrastructure with a description, exposure scenarios and opportunities. Infrastructure includes municipal wells and ponds/dams. The GCA Hurricane Plan was summarized. Flood Resilience is addressed by the City of Houston.	
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); Water quality (physical, chemical and biological quality of influent and effluent) and possible sources of water pollution; Important Water-Related Areas (identification and status); Water-related costs (including capital investment expenditures, water procurement, water	2.4.1 Copies of existing water stewardship and incident response plans	Yes			The Water Stewardship Plan, NWNA Pasadena Emergency Action Plan, Evacuation Map and Pasadena Factory Crisis Management Call List were reviewed. Incident response was addressed in the plans. **OBS 2019.01 was issued.** The Crisis Management Call List should be updated with the new Plant Manager.	
		2.4.2 Site water balance (in Mm3 or m3) by temporally relevant time unit and water-use intensity metric (Mm3orm3 per unit of production or service)	Yes			NWNA 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 September 2019, the Pasadena plant year to date WWR is 1.48 L/L.	
		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			A summary of water quality tests conducted at the site on incoming source water and finished product was provided. To verify the internal water quality results, samples get sent once a year to an external accredited laboratory. Monthly or higher frequency data were provided for water quality of spring sources and effluent. NWNA water quality protocol includes pH, T, DO, TDS and other constituents. Water quality data is regularly compared to NWNA and MCL available screening criteria. The records reviewed showed that no parameters exceeded any regulatory standards. The system is automated so that if a value is out of limits, the system shuts down. NWNA is notified and must respond if the effluent quality is out of required limits (e.g. if pH exceeds certain amount).	
		2.4.4 Inventory of all material water- related chemicals used or stored on- site that are possible causes of water pollution	Yes			A list of all onsite chemicals stored at the site was provided. Chemical storage was inspected during audit of the facility.	
		2.4.5 Documentation identifying existing, or historic, onsite Important Water-Related Areas, including a description of their status	Yes			No on-site IWRAs were 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		No		Finances are compiled and reviewed by NWNA corporate headquarters. Site level costs were presented, and social and environmental values were described. Normally revenue data is reviewed regionally or at the product level, not at the level of individual sites. NWNA Pasadena provided "NWNA Investing In Creating Jobs and Investment in Texas" Fact Sheet for 2018. The report summarized NWNA contribution to the economy and service commitment at a statewide and local level. **Minor NC 2019.01 was issued**. Revenues and shared services are not provided. Interviews indicated this data is not tracked at the site level and unable to be provided at this time.	
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			A list of primary inputs with annual water consumption values, and origin for each input was provided for the Pasadena site. Analysis includes water use associated with packaging, transportation, cooling, end of life, and level of water stress. A report of the study "Cubes 2016" prepared for the NWNA for the US and Canada market was reviewed[2]. It contained a detailed footprint analysis of the water embedded in all the products used. This analysis showed that there is a clear decreasing trend in greenhouse effects, water consumption and non-renewable energy use from 2010 to 2015.	
		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. Calculations conducted indicate the Blue Water Scarcity Value and provides the score of the water stress. Current Baseline Water Stress is generally medium to high for all vendors and outsourced services.	
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 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	Yes			A prioritized list with rationale of shared water challenges was provided and reviewed. Drivers and public-sector agency efforts are noted as well. Public/Consumer Awareness & Education is prioritized as first, on a scale of 1-4. NWNA Pasadena challenges were prioritized based on CRP 2.0 stakeholder feedback and corporate initiatives.	
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, 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	Yes			A prioritized list of water risks was provided and reviewed. Water risks matched shared water challenges. Public/Consumer Education prioritized first, on a scale of 1-4.	
		2.7.2 Prioritized list of water-related opportunities for the site	Yes			A prioritized list of water-related opportunities for the site and match the shared water challenges and water risks lists. First priority is based on the Public/Consumer Education and focusing on transparency about operations.	
		2.7.3 Estimate of potential savings/value creation	Yes			A prioritized list of projects, savings and value creation submitted and reviewed. Value creation was quantified, as applicable.	
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 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	Yes			The NWNA Pasadena Compliance Matrix was provided and reviewed. Included in the matrix are the listed permits and responsible staff to ensure maintenance of compliance.	
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 components (see Guidance for plan template): A strategy that considers the shared water challenges within the catchment, water risks for the site	3.2.1 Available water stewardship strategy	Yes			A water stewardship strategy statement signed by the factory manager on 8/1/19 was provided and reviewed. NWNA Pasadena strategy 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			A detailed water stewardship plan was created as part of the AWS process. The plan is broken into objectives, targets, and actions. There are different actions corresponding to different targets, each with their own metrics, budget, responsible person, status, and other criteria. Public Consumer/Education, Water Efficiency, Water Quality, and Water Quantity are the water topics identified in this plan.	

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			NWNA Pasadena provided their General Spill Response Procedures and Emergency Action Plan documents which included a description of their required responses and resilience operations to water related issues and risks. Modifications to the plans are captured through revision/amendment comments. Additionally, an annual review is part of standard procedures to evaluate the plan's effectiveness. **OBS 2019.2 was issued.** South Texas SHE & TPM Manager, reported that based on their environmental consultant, the Pasadena factory does not need a NEC or SWPPP. NWNA Pasadena is currently in the process to request to change the Standard Industrial Code of their factory to reflect that. During surveillance audit, check on the status of this to verify full compliance.	
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			NWNA Pasadena provided the outreach log and communication with catchment authorities about the AWS process. Communication and outreach confirmed through stakeholder interviews.	
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, 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	4.1.1 Documentation demonstrating compliance	Yes			NWNA Pasadena compliance matrix and environmental audit report were provided and met the indicator criteria. Permits for the Spring, Storm Water, Waste Water were also provided for review.	
		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			No unmet human rights needs identified within this catchment.	
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 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	4.2.1 Measurement-based evidence showing that targets have been met	Yes			The site has improved its water efficiency, narrowly missing its target, by implementing the following measures: completing a bottle line replacement and planning a wastewater reuse project. The site had a WWR of 1.367 versus target of 1.339 for year 2018.	
		4.2.2 (Water scarce catchments only) Evidence of continual decrease or best practice	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 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	4.3.1 Measurement-based evidence showing that targets have been met	Yes			Measurement system is in place for water quality targets throughout the site, data from previous monitoring reports were reviewed. Annual review of data was found to be within historic values and regulatory limits. Water monitoring protocol was discussed with quality assurance manager. Wastewater results are within permitted values.	
		4.3.2 (Water quality-stressed catchments only) Evidence of continual improvement or best practice	Yes			Stressed water quality is not identified within this catchment.	
		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	Yes			Stressed water quality is not identified within this catchment.	
Core	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	Yes			No IWRAs are present at the Pasadena site. Catchment IWRAs have been identified together with their current status, future trends and site status. IWRAs are discussed in their AWS presentations to stakeholders. NWNA Pasadena has an established history of participating in clean-up efforts of the Trash Bash. Progress towards implementation of IWRA plans are identified and documented.	
		4.4.2 (Degraded Important Water- Related Area catchments only) Evidence of continual improvement or best practice	Yes			Degraded IWRAs areas not identified within this catchment.	
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			NWNA Pasadena provided documentation of their efforts to support good catchment governance through participation with the local governing agencies, sharing information with agencies and through continuing to refine the Moffit Spring Conceptual site model.	
		4.5.2 (Weak water governance catchments only) Evidence of continual improvement or best practice	Yes			Weak water governance is not identified in the catchment.	
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). The nature of the product made at the facility requires strict adherence to these principals.	
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			Evidence indicated there are no concerns with any shared water related infrastructure. NWNA regularly shares aquifer and surface water information from Moffit Spring with stakeholders.	
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							
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			NWNA has evaluated performance of the Stewardship Plan which is aligned with realizing the AWS Outcomes. Targets established in the Plan are tracked based on multiple actions with measurable metrics, documentation of stakeholder engagement, and evaluation of changes in water risk for each target. The evaluation also includes a cost/benefits review and describes shared value benefits for each target. Further evaluation will be conducted during the surveillance and renewal audits.	
		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			Refer to 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			Refer to 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 plan.	5.2.1 Documented evidence (e.g., annual review and proposed measures)	Yes			Water related emergency events have occurred such as hurricanes and tropical storms. Factory operations were suspended for life safety protection of personnel and their families due to Imelda flooding during the Dual Houston Sites visit. The annual environmental reviews document these emergency events. Based on observations during the visit, the Plant was prepared, communicative and demonstrated effective prevention measures.	
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			Internal and external stakeholder outreach conducted through the CRP 2.0. Responses covered the main topics of Water Resource Management, Relations with Stakeholders, Industrial Impacts and Local Contribution. Internal and external stakeholders noted Public/Consumer Education as the highest priority.	
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			NA	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			NWNA Pasadena facility posts the factory organization chart in the entry of the factory floor where it will be observed the most by staff and during factory open houses with operational tours. The organization chart includes the staff and relevant responsible personnel for water-related laws and regulations. Factory open houses also include presentations on the site's water stewardship projects and implementation of 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	Yes			The stakeholder presentation was reviewed, the presentation includes the site's water stewardship performance results. NWNA Pasadena conducted public/consumer education outreach through factory tours; distribution of stakeholder presentations, programming to local school districts; and providing attendees presentations that reviewed the sites water challenges, stakeholder feedback, targets, with implementation outcomes.	
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			The stakeholder presentation was reviewed. Presentation includes the site's water stewardship performance results. The presentation was provided to stakeholders prior to the onsite audit. List of attendees reviewed at the facility. NWNA Pasadena conducted public/consumer education outreach through factory tours; environmental education programming to local school districts; and providing attendee presentations that reviewed the sites water challenges, stakeholder feedback, targets, with implementation outcomes.	
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 water must be reported immediately to relevant public agencies.	6.4.1 Available list of water-related compliance violations with corresponding corrective actions	Yes			Violations are publicly available through state and federal reporting (ECHO/USEPA). There were no violations reported at the site.	
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			Sign-in sheet for the 2019 Factory Tour and Plantwide AWS Training was provided. NWNA have discussed AWS with their managers during regular conference calls.	

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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 the any of the criteria for Major non-compliance the audit team shall grade the finding as a minor non-conformity.
Applicants must submit an acceptable corrective action plan^ to address all minor non-conformities to be recommended for certification.
Certificate Holders must close minor NCR within Ninety (90) days of the NCR issue date. SCS may agree to an alternative time frame with the client as long as this can be justified and is documented in the NCR report.
If corrective actions are inadequate to resolve a minor non-conformity by the time of the next scheduled audit, SCS shall upgrade the audit finding to a major non- conformity.
If an unusually large number of minor non-conformities are detected during the course of a single audit, the audit team may at their discretion raise a major non-conformity to reflect a systematic failure of the client's management system to deliver conformity with the AWS Standard.

** closed = actioned by the client, corrections & corrective actions verified and closed by the auditor.*
^The corrective action plan shall include an analysis of the root cause of the minor non-conformity; the specific corrective action(s) to address the minor non-conformity; and an appropriate time frame to implement corrective action(s).

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

NC #	Section #	Minor – Detail on Non Conformance	Due Date (XX calendar Days)	Corrective Action Taken
Minor NC 2019.01	2.4.6	Revenues and shared services are not provided. Interviews indicated this data is not tracked at the site level and unable to be provided at this time. NC's associated with Indicator 2.4 will be extended for one (1) year to provide time for the AWS Technical Committee guidance to be released with the forthcoming revised AWS Standard (v2.0). Nestle' should use this additional time to comply with the intent of this indicator to ensure their certified status.	1 year	Root Cause Analysis: Currently, the company tracks financial data by total brand values and not at a factory-specific level. However, costs and revenues were presented for financial data as specifically attributed to the factory, where possible. The aggregate nature of some of the values led to presentation of some N/A values. Corrective Action: Revised water-related costs and revenues will be presented and/or estimated for the site, where possible. Explicit references will be made regarding social and environmental values provided to the catchment, as possible.

OBS #	Section #	Observation – Detail on Opportunity for Improvement	Due Date	Corrective Action Taken
OBS 2019-001	2.4.1	The Crisis Management Call List should be updated with the new Plant Manager.	Not Required	**Note:** We understand the observation and will take the advice under consideration. No Corrective Action Plan required.
OBS 2019-002	3.3.1	South Texas SHE & TPM Manager, reported that based on their environmental consultant the Pasadena factory does not need a NEC or SWPPP. NWNA Pasadena is currently in the process to request to change the Standard Industrial Code of their factory to reflect that. During surveillance audit, check on the status of this to verify full compliance.	Not Required	**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, Managing Director**
	Technical Review by:		**Nicole Munoz, Managing Director** *(not valid without signature)*
	Date of decision:		
	Surveillance schedule:	**Next audit is scheduled for** *(include range)* **: Sept. 2020 to Nov 2020**	