

Client Name: NWNA Poland, Maine Factory
AWS Registration Number: AWS-000209
Client Representative: Brandon Kienenberger, NWNA Sustainability Analyst
Audit Team: Rae Mindock/Lead Auditor
 Isabella Polenghi-Gross/Technical Specialist
 Shana Golden/Team Auditor
Audit Dates: September 28, 2020 (Remote Audit)
Stakeholder Notification: March 2020 and September 2020, SCS and AWS websites, Poland Maine Newspaper
Site Location: 109 Poland Spring Dr, Poland, Maine 042744
Report Date: November 9, 2020

Standard: AWS International Water Stewardship Standard - Version 2.0, March 22, 2019

Audit Type	<input type="checkbox"/> Gap Analysis <input type="checkbox"/> Pre-assessment	<input checked="" type="checkbox"/> Initial Certification	<input type="checkbox"/> Surveillance <input type="checkbox"/> Recertification
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Level of Certification	<input type="checkbox"/> Core	<input type="checkbox"/> Gold	<input checked="" type="checkbox"/> Platinum
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Site Information

Site Description

The Nwana Poland Factory is a water bottling facility, producing bottled water products under the brand names of Poland Spring Water, Poland Spring Sparkling, and Poland Spring Distilled. The factory produces a variety of different bottle types ranging from 8 oz to 2.5 gallon from eleven bottling lines. The geographic scope of the site is limited to the property boundary of the facility. The facility is located in a rural setting. Water for the bottling facility comes from several sources, and spring water is delivered by pipeline or tanker from one of several regional springs, primarily: Poland Spring, Garden Spring, and Ellis Spring. The municipal water from Lake Auburn provides water for sanitary services. Wastewater services are provided by Lewiston-Auburn Wastewater Treatment Plant.

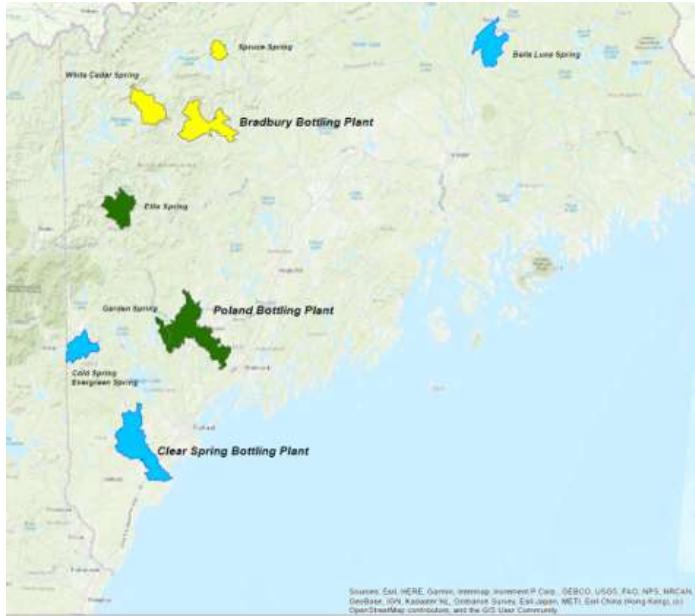


Catchment Description

The Poland Factory is located in the Lower Androscoggin Subbasin (HUC 01040002). The AWS Poland Factory sub-catchment is approximately 93,000 acres and includes the municipal water source (Lake Auburn), bottling operations (Poland site), and the discharge recipient (Lewiston-Auburn Wastewater Treatment Plant) and receiving water body (Androscoggin River). Additional water sources are included within two sub-catchments: Garden Spring sub-catchment (approximately 9,700 acres) and Ellis Spring sub-catchment (approximately 39,525 acres). Collectively, these three sub-catchments comprise the Poland AWS Catchment.

The Poland Spring brand is supported by three factories in Maine (Poland, Hollis and Kingfield) and one factory in Massachusetts (Framingham). There are ten springs which may provide spring water for the factories: Poland Spring, Garden Spring, Ellis Spring, Bella Luna Springs, Spruce Springs, White Cedar Spring, Bradbury Springs, Evergreen Spring, Cold Springs, Clear Spring. Each of the spring catchments were mapped and are associated with a Maine Factory. Conformity assessments were conducted at the three factories, therefore including the ten springs. The primary springs associated with each factory are noted in each Certification Report. This Certification Report is for the Poland Factory. The other reports

include Hollis (Bradbury) Factory, Kingfield (Clear Spring) and Framingham. Regional/historic names may persist.

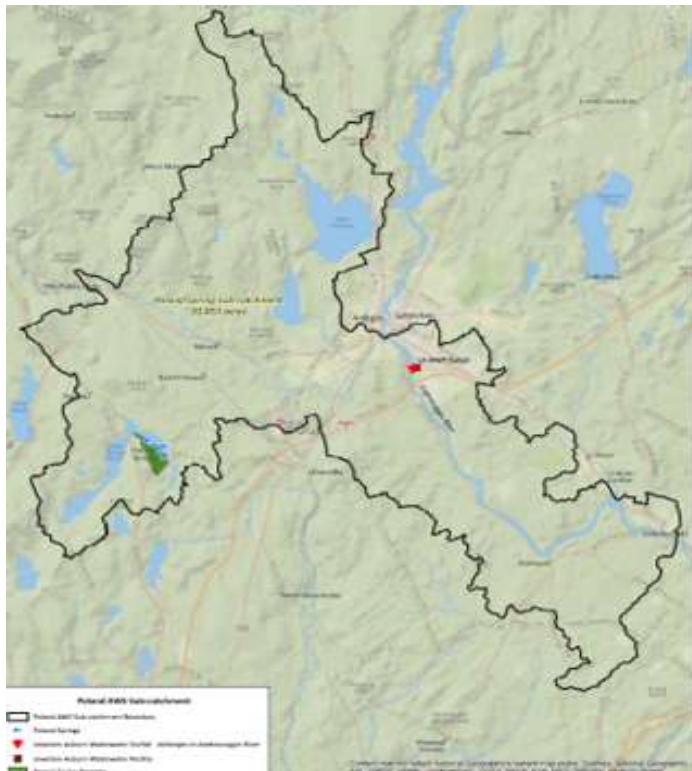


Maine Factories and Spring Site system.

Green represents the Poland Factory and sub-catchments: Poland Spring, Garden Spring and Ellis Spring.

Blue represents the Hollis Factory and sub-catchments: Clear Spring, Cold Spring/Evergreen Springs and Bella Luna Springs.

Yellow represents the Kingfield Factory and sub-catchments: Bradbury Springs, White Cedar Spring and Spruce Springs.



The Poland Spring sub-catchment (93,850 acres) includes the Factory, Poland Spring, Lake Auburn, Lewiston-Auburn Wastewater Treatment Plant, and the Androscoggin River. There are two other sub-catchments associated with the Factory the Garden Spring sub-catchment (9,700 acres) and the Ellis Spring sub-catchment (39,525 acres).

Shared Water Challenges

Shared water challenges are catchment water-related issues shared by the site and stakeholders. Stakeholder engagement was documented, and auditor interviews confirmed the topics of engagement. Primary water-related risks to the site include water quantity; other shared water challenges include water quality, tankering (trucking), public education surrounding water use, and weather extremes. A prioritized list of shared water challenges addressing the outcomes was provided.

To better understand catchment issues and opportunities, NWNA regularly meets with catchment authorities including on an annual basis. The Factory has implemented Forest Management Plans at each of the springs, conducted tours of operations, provided local presentations on water stewardship through AWS, installed driver signage, conducted snowpack monitoring and hosted World Water Day 2019 focusing on WASH. Water efficiency projects in 2019 included contact tank run-out program, flushing optimization effort and continuing refinement of the factory water map. To support COVID-19 activities, the factory created and donated 34,000 blue-tinted bottles to fill with hand sanitizer.

Audit Attendees

Participant/Title	Opening Meeting	Document Review	Site Inspection	Closing Meeting
Community Relations Manager	X	X	X	X
Community Relations Specialist	X	X	X	X
Factory Manager	X	X	X	X
SHE Manager	X	X	X	X
QA Manager	X	X	X	X
External Consultant	X	X	X	
External Consultant	X	X	X	
Natural Resources Manager	X	X	X	X
NWNA Sustainability Analyst	X	X	X	X

The NWNA Poland Factory provided documentation using SharePoint file share to support conformity with the AWS Standard v2.0 including: Stakeholder Outreach Log, Community Relations Process (CRP) Summary, Factory AWS Presentation, NWNA Water Map, Catchment Water Balance, and Water Stewardship Plan. The Water Stewardship Plan is a working document which is continually updated with information regarding how shared water challenges are being addressed included progress, performance evaluation and stakeholder feedback. Other supporting documentation were also provided as evidence.


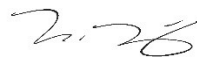
Summary of Findings

Step	Major	Minor	Observations	Total Points
1. Gather & Understand	0	0	1	10
2. Commit & Plan	0	0	0	15
3. Implement	0	0	0	75
4. Evaluate	0	0	0	6
5. Communicate & Disclose	0	0	0	0
TOTAL	0	0	1	106

Audit Non-conformities and Observations

Non-Conformity (Major or Minor) or Observation	Citation	Criteria/ Indicator	Due Date	Detail and Corrective Action
Observation	OBS 2020.01	1.1.1	NR	Indicator requirements were provided on multiple maps and engineering drawings, it would be beneficial to provide the site related indicators on a single map.
				Root Cause Analysis and Corrective Action Not Required for Observation
				.
				Root Cause Analysis and Corrective Action

Certification Decision

<i>Auditor's recommendation for initial, continued or re-certification based on compliance with requirements:</i>	X	Recommended
		Not Recommended
<i>Level of Certification recommended</i>		AWS Core
		AWS Gold
	X	AWS Platinum
<i>SCS Certification Decision:</i>	X	Approved
		Denied
<i>Certification Decision/ Technical Review by:</i>		 Nicole Munoz, November 25, 2020
<i>Date of Decision:</i>		 Nicole Munoz, November 25, 2020
<i>Surveillance Schedule:</i>		Next audit is scheduled for: October 2021 to March 2022 (18 Month Surveillance to be Recommended)

AWS International Water Stewardship Standard, Version 2.0, March 22, 2019

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

STEP 1: Gather and Understand

Level	Criteria	Indicator	Yes	No	NA	Objective Evidence/Finding	Points
Core	1.1 Gather information to define the site's physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant	1.1.1 The physical scope of the site shall be mapped , considering the regulatory landscape and zone of stakeholder interests, including: <ul style="list-style-type: none"> - Site boundaries; - Water-related infrastructure, including piping network, owned or managed by the site or its parent organization; - Any water sources providing water to the site that are owned or managed by the site or its parent organization; - Water service provider (if applicable) and its ultimate water source; - Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies; - Catchment(s) that the site affect(s) and is reliant upon for water. 	Yes			<p>NWNA Poland factory is located on Route 122 in the town of Poland, Maine. A Conference Center and the Poland Spring Museum (including the Spring House) are also located on property adjacent to the bottling plant and are part of Poland Spring Preservation Park. The factory is supplied by onsite spring water through pipelines and by off-site spring water through tankers. The factory may receive spring water from Poland Spring, Garden Spring, Ellis Spring, Bella Luna Springs, Spruce Springs, White Cedar Spring, Bradbury Springs, Evergreen Spring, Cold Springs, and/or Clear Spring. A map of each spring watershed was provided and reviewed. The factory, the Conference Center and the Museum, also receive municipal water from Lake Auburn via a public water system operated by the City of Auburn which is used only for facility needs).</p> <p>The water-related infrastructure at the factory was mapped including: layout of bottle lines, locations of the springs pipeline, borings locations, storage tanks, sanitary sewer discharge, stormwater discharge, and retention ponds.</p> <p>The facility produces wastewater that flows to an in-line process wastewater storage tank and then to a sump. The sanitary wastewater from the bottling plant, Conference Center and Museum also collects in this sump. The combined flow is pumped to the public sewer system and treated at the Lewiston-Auburn Wastewater Pollution Control Authority's wastewater treatment plant, which discharges to the Androscoggin River and ultimately to the Atlantic Ocean. Stormwater is managed on site through collection, retention and evaporation/infiltration; runoff is conveyed by on-site stormwater facilities to the north, south and east of the Plant Building into onsite basins and ponds that do not have outfalls.</p> <p>The Poland site covers an area of approximately 345 acres. Poland Catchment (143,075 acres) includes three sub-catchments: Poland Spring (93,850 acres), Garden Spring (9,700 acres), Ellis Spring (39,525 acres). The areas are defined and mapped. The catchments are located within the Androscoggin River Watershed.</p> <p>OBS 2020.01 was issued. Indicator requirements were provided on multiple maps and engineering drawings, it would be beneficial to provide the site related indicators on a single map.</p>	

	<p>1.2 Understand relevant stakeholders, their water related challenges, and the site’s ability to influence beyond its boundaries.</p>	<p>1.2.1 Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified.</p> <p>This process shall:</p> <ul style="list-style-type: none"> - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders, representative of the site’s ultimate water source and ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; - Identify the degree of stakeholder engagement based on their level of interest and influence. 	<p>Yes</p>			<p>The stakeholder map created during the Nestlé Community Relations Process (CRP) was reviewed. The CRP includes identification of local population, authorities (municipalities), businesses (economic neighbors), and NGOs. Stakeholders identified include Poland Fire Chief, Town Manager, Economic Development Committee, Poland Spring Resort, local suppliers, manufacturers, school districts, community outreach programs, regional and state representatives.</p> <p>The Outreach log included individuals and organizations consulted with since 2017, including notes on conversations which provided information on water-related interests/challenges. The summary includes actions, follow-up and feedback.</p> <p>The CRP includes ranking of stakeholder influence and interest with levels of influence and interest defined; suggested engagement based on characterization provided.</p>	
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		1.2.2 Current and potential degree of influence between site and stakeholder shall be identified , within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.	Yes		Stakeholders are related to the site's catchment and identifies the stakeholders' ability to influence or be influenced. Influence/Interest is characterized (low to critical) and further describe opinions towards NWNA.	
	1.3 Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.	1.3.1 Existing water-related incident response plans shall be identified .	Yes		The Water Stewardship Plan, Integrated Contingency Plan (ICP) and Stormwater Management Plan were reviewed. Incident response was addressed in the plans.	
		1.3.2 Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped .	Yes		NWNA Poland provided water maps containing inputs and outputs of water at this facility. Data showing monthly water inflows, outflows, storage and losses for each bottling line at the Factory were reviewed. The map indicates water sources, water treatment, process units, wastewater treatment and production.	
		1.3.3 Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified . Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified .	Yes		NWNA Poland provided water maps containing inputs and outputs of water at this facility. Poland utilizes a Water Withdrawal Ratio (WWR) to evaluate efficiency, measuring Liters of water used to produce a Liter of product. The actual value for 2019 was 1.120 l/l against the goal of 1.110 l/l, the target WWR for 2020 is 1.120. NWNA Poland provided WWR on a monthly basis for 2019 with high and low variance. The comparison of previous years shows an overall increase in water efficiency over the course of several years.	
		1.3.4 Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified . Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and	Yes		A summary of water quality tests conducted at the site on incoming source water and finished product was provided. Water testing is conducted weekly and annually on all incoming water. To verify the internal water quality results, samples get sent at least once a year to an external accredited laboratory. Monthly data were provided for water quality of spring sources, municipal water, and effluent. NWNA water quality testing protocol includes pH, temperature, dissolved oxygen, total dissolved solids and other constituents. Water quality data is regularly compared to NWNA and available MCL screening criteria. The records reviewed showed that no parameters exceeded any regulatory standards. Effluent and receiving water quality data were also provided. The effluent system is automated so that if a value is out of limits, the	

		where appropriate, seasonal, high and low variances shall be quantified .				system shuts down. NWNA Poland is notified and must respond if the effluent quality is out of required limits (e.g. if pH exceeds certain amount).	
		1.3.5 Potential sources of pollution shall be identified and if applicable, mapped , including chemicals used or stored on site.	Yes			A list of all chemicals stored at the site was provided in the Integrated Contingency Plan with a description of their location, container types and quantities. The locations of the chemicals stored within the Factory were mapped on the Facility Layout.	
		1.3.6 On-site Important Water-Related Areas shall be identified and mapped , including a description of their status including Indigenous cultural values.	Yes			Site IWRAs have been identified by NWNA Poland, and a description of their water-related issues was provided. IWRAs include: <ul style="list-style-type: none"> • Town of Poland Resource Protection Area • Town of Poland Aquifer Protection Overlay District 1 • Spring Source Boreholes and Contributing Areas • Freshwater Forested Wetlands 	
		1.3.7 Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.	Yes			Site level costs were presented including costs to implement water stewardship actions and factory-related costs were provided and reviewed. Finances are prepared by NWNA corporate headquarters with revenues compiled at a company level. Annual revenue for NWNA is publicly available on the NWNA website. The shared value generated included examples such as donations to local food banks and during emergency situations, preserving and improvement catchment quality through forest management, education provided to inform public, improved IWRAs, etc.	
		1.3.8 Levels of access and adequacy of WASH at the site shall be identified .	Yes			WASH is available on-site with potable water and toilets for employees and visitors. The Factory utilized “Self-Assessment Tool for Evaluating Access to Water, Sanitation and Hygiene (WASH) at the Workplace”.	
	1.4 Gather data on the site’s indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used	1.4.1 The embedded water use of primary inputs, including quantity, quality and level of water risk within the site’s catchment, shall be identified .	Yes			A list of primary inputs for outsourced services was provided with designation of location. Information on water source with annual water consumption values, and origin for each input was provided by the factory. Water use includes industrial and municipal and is associated with packaging, transportation, cooling, end of life. This analysis also includes the level of water stress.	
		1.4.2 The embedded water use of outsourced services shall be identified , and where those services originate	Yes			Documentation on embedded water use indicates values of water consumptions and availability. Calculations conducted provide the current and projected score of the water stress. The factory worked to obtain updated quantified water use information from services in and outside of the catchment.	

	in out-sourced water-related services.	within the site's catchment, <i>quantified</i> .				
	Advanced Indicator	1.4.3 Advanced Indicator The embedded water use of primary inputs in catchment(s) of origin shall be <i>quantified</i> .				This Advanced Indicator was not considered for the Site .
	1.5 Gather water-related data for the catchment, including: water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH	1.5.1 Water governance initiatives shall be <i>identified</i> , including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.	Yes			A list of significant publicly-led initiatives and water-related public policy goals for the catchment was provided at the state, regional, county, city, and district level.
		1.5.2 Applicable water-related legal and regulatory requirements shall be <i>identified</i> , including legally-defined and/or stakeholder-verified customary water rights.	Yes			A list of federal, state, local permits and regulatory requirements was provided, including permits issued by the Maine Department of Environmental Protection (DEP). List of relevant and applicable legal and other requirements were also provided and reviewed.
		1.5.3 The catchment water-balance, and where applicable, scarcity, shall be <i>quantified</i> , including indication of annual, and where appropriate, seasonal, variance.	Yes			The catchment water balance with precipitation, runoff, stream flows data, and withdrawals from public water systems, springs, agricultural, and private wells were provided for the NWNA Poland Factory sub-catchments. Data is presented as an annual average from long-term periods. The seasonal variability was provided using monthly data from the large public water systems and Poland Spring withdrawals. Narrative was provided to explain that even though climate model forecasts predict wetter future years, during drier years, the factory is flexible enough to adjust its operations and only extract water from sources located in wetter areas.
		1.5.4 Water quality, including physical, chemical, and biological status, of the catchment shall be <i>identified</i> , and where possible,	Yes			Publicly-available water quality information were provided for the site catchment. This included descriptions of the status of the Androscoggin River, which is the receiving water body in the catchment, before water gets discharged to the Atlantic Ocean and of Auburn Lake water, the area water supply, which is treated according to federal and state standards to remove any possible harmful contaminants.

		<i>quantified</i> . Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be <i>identified</i> .			Spring water comes from separate catchments and water quality documentation was made available for each one of them. Spring water undergoes the standard State required annual water quality testing performed by third party, accredited laboratories. Additionally, Nwana Poland performs quarterly, monthly, and weekly water quality testing on additional constituents and parameters. Trending of all water quality sources is evaluated annually and compared to historical data and water quality goals.	
		1.5.5 Important Water-Related Areas shall be identified, and where appropriate, <i>mapped</i> , and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.	Yes		IWRAs have been identified by Nwana, along with a description of their water-related status. IWRAs include: <ul style="list-style-type: none"> - Upper, Middle, and Lower Range Ponds (Lower Range Pond is the nearest open water body where the springs water would naturally flow into) - Range Pond State Park - Lake Auburn - Taylor Pond - Little Androscoggin River - Tripp Pond - Whitney Pond - Hogan Pond - Ellis River 	
		1.5.6 Existing and planned water-related infrastructure shall be <i>identified</i> , including condition and potential 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 imported water infrastructure, municipal wells and ponds/dams.	
		1.5.7 The adequacy of available WASH services within the catchment shall be <i>identified</i> .	Yes		WWF Water Risk Filter (Sanitation and Access), Maine Water, Fryeburg Water Company information based on demographic information was provided to support the adequacy of WASH. Nwana Poland supports local food banks, disaster relief organizations, and local agencies work to meet the needs of populations who do not have access to WASH.	
	Advanced Indicator	1.5.8 Advanced Indicator Efforts by the site to support and undertake catchment level water-related data collection shall be identified.	Yes		Annual monitoring report summaries and other documents were provided and reviewed for all spring sources, containing flow data and evidence of water samples and monitoring efforts conducted regularly and frequently at the water sources as well as in the adjacent environment. These data are reported to local and state agencies on a monthly, quarterly and/or annual basis and are available to agencies for water governance tracking and planning within the catchment.	7

	Advanced Indicator	1.5.9 Advanced Indicator The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified.				This Advanced Indicator was not considered for the Site	
	1.6 Understand current and future shared water challenges in the catchment, by linking the water challenges <i>identified</i> by stakeholders with the site's water challenges.	1.6.1 Shared water challenges shall be <i>identified</i> and prioritized from the information gathered.	Yes			A prioritized list with rationale of shared water challenges was provided and reviewed. Drivers and public-sector agency efforts are noted as well. Water quantity is prioritized as first, on a scale of 1-4. Nwana Poland challenges were prioritized based on stakeholder feedback and corporate initiatives.	
		1.6.2 Initiatives to address shared water challenges shall be <i>identified</i> .	Yes			A list of existing initiatives was provided and reviewed.	
	Advanced Indicator	1.6.3 Advanced Indicator Future water issues shall be identified, including anticipated impacts and trends	Yes			Future water issues within the Poland Spring factory catchment were identified and linked to shared water challenges (i.e. water quality and quantity). An assessment of existing trends and anticipated impacts was performed and summarized, and the water stewardship plan actions was updated accordingly.	3
	Advanced Indicator	1.6.4 Advanced Indicator Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water.				This Advanced Indicator was not considered for the Site.	
	1.7 Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends <i>identified</i> in 1.6.	1.7.1 Water risks faced by the site shall be <i>identified</i> , and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.	Yes			A prioritized list of water risks was provided and reviewed. Water risks matched shared water challenges. Water quantity is prioritized first, on a scale of 1-4.	
		1.7.2 Water-related opportunities shall be <i>identified</i> , including how the site may participate, assessment and prioritization	Yes			A prioritized list of water-related opportunities was provided for the site and match the shared water challenges and water risks lists. First priority is based on water quantity and to ensure available supply. A prioritized list of projects, savings and value creation was submitted and reviewed. Value creation was quantified, as applicable.	

		of potential savings, and business opportunities.				
1.8 Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.	1.8.1 Relevant catchment best practice for water governance shall be <i>identified</i> .	Yes			<p>NWNA has identified multiple best practices toward achieving AWS outcomes at the site and in the catchment. The following best practices are examples for Indicators 1.8.1 - 1.8.5</p> <p>NWNA identified the U.S. Global Water Strategy, Pacific Institute/CEO Water Mandate, Setting Site Water Targets informed by Catchment Context, Case Study: Santa Ana River Watershed, CA. The study which references AWS, was supported by companies endorsing CEO Water Mandate, including NWNA.</p> <p>NWNA engages with catchment authorities and other stakeholders to share information, practices and drive water stewardship practices.</p>	
	1.8.2 Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be <i>identified</i> .	Yes			<p>NWNA identified The Beverage Industry Continues to Drive Improvement in Water, Energy, and Emissions Efficiency, 2108 Benchmarking Study.</p> <p>NWNA uses the sector specific efficiency metric of water use ratio (liters of water used in the process/liter of bottles water) to track onsite efficiency and established a target to monitor continual improvement.</p>	
	1.8.3 Relevant sector and/or catchment best practice for water quality shall be <i>identified</i> , including rationale for data source.	Yes			<p>NWNA identified Sector best practice for Processing and Bottling of Bottled Drinking Water is established in CFR Title 21, Part 129.</p> <p>NWNA exceeds requirements outlined with sampling frequency, parameters analyzed and consistency across the business unit.</p>	
	1.8.4 Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be <i>identified</i> .	Yes			<p>NWNA identified 1)Assessment, management and monitoring of High Conservation Value Forest (HCVF) A practical guide for forest managers and 2)Good practice guidelines for High Conservation Value assessments, A practical guide for practitioners and auditors both by ProForest.</p> <p>NWNA follows practices described by ProForest by assigning Natural Resource Manager for each site who focuses on maintenance of springs and other IWRAs.</p>	
	1.8.5 Relevant sector and/or catchment best practice for site provision of equitable	Yes			<p>NWNA identified the Water Aid Corporate engagement on water supply, sanitation and hygiene: Driving progress on Sustainable Development Goal 6 (SDG6) through supply-chains and voluntary standards.</p>	

		and adequate WASH services shall be <i>identified</i> .				NWNA established the Nestlé Guidelines on Respecting the Human Rights to Water and Sanitation, which is extended to suppliers.	
Advance Points Step 1							10
STEP 2: Commit and Plan							
Level	Criteria	Indicator	Yes	No	NA	Objective Evidence	Points
	2.1 Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.	2.1.1 A signed and publicly disclosed site statement OR organizational document shall be <i>identified</i> . The statement or document shall include the following commitments: - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard.	Yes			A pledge, signed by the site factory manager, was reviewed containing all elements described in this indicator.	
	Advanced Indicator	2.1.2 Advanced Indicator A statement that explicitly covers all requirements set out in Indicator 2.1.1 and is signed by the organization's senior-most executive or				This Advanced Indicator was not considered for the Site.	

		governance body and publicly disclosed shall be identified.				
	2.2 Develop and document a process to achieve and maintain legal and regulatory compliance.	2.2.1 The system to maintain compliance obligations for water and wastewater management shall be identified , including: <ul style="list-style-type: none"> - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies. 	Yes			The NWNA Compliance Matrix was provided and reviewed. Included in the matrix are the listed permits and responsible staff to ensure maintenance of compliance. A third-party is contracted to confirm compliance is maintained. In addition, the facility is ISO 14001 Certified (documentation for this certification were reviewed).
	2.3 Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.	2.3.1 A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.	Yes			A water stewardship strategy statement signed by the factory manager was provided and reviewed. NWNA Poland strategy is a high-level document stating the overall strategy is in alignment with the AWS requirements.
		2.3.2 A water stewardship plan shall be identified , including for each target: <ul style="list-style-type: none"> - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best 	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, Tankering, Weather Extremes, Water Quality, and Water Quantity are the water topics identified in this plan.

		practice to help address shared water challenges and the AWS outcomes.					
	Advanced Indicator	2.3.3 Advanced Indicator The site's partnership/water stewardship activities with other sites within the same catchment (which may or may not be under the same organizational ownership) shall be <i>identified</i> and described.	Yes			The Poland Factory, and other Poland Springs Factories, conducts stewardship activities in the catchment. Brookie Buddies, an education program established in 2007 at the Poland Factory, is conducted in the Poland Spring sub-catchment and Ellis Spring sub-catchment, and other catchments across the State. Brookie Buddies is an environmental stewardship program which provides hands-on experience cultivating fish habitats. Educational information on water cycle, monitoring trout growth, release of trout, and water quality is shared with students.	4
	Advanced Indicator	2.3.4 Advanced Indicator The site's partnership/water stewardship activities with other sites in another catchment(s) (either under same corporate structure or with another corporate site) shall be <i>identified</i> .	Yes			Documentation was provided and reviewed, describing the Snowpack Monitoring work through the United States Geological Survey (USGS) and Maine Geological Survey (MGS), whose objective is to conduct data gathering efforts, share data, and support emergency planning. The snowpack monitor data is available to the public on the USGS Portal.	4
	Advanced Indicator	2.3.5 Advanced Indicator Stakeholder consensus shall be sought on the site's water stewardship plan. Consensus should be achieved on at least one target. A list of targets that have consensus and in which stakeholders are involved shall be <i>identified</i> .	Yes			Poland Factory team members meet on an annual basis to discuss updates on the water stewardship plan, including targets achieved. Stakeholders include Poland Spring Resort, Poland Town Manager, Androscoggin River Watershed Association and the Maine Bureau of Parks and Land. Discussions included targets identified in the WSP, with consensus documented in meeting notes, and confirmed during stakeholder interviews.	7
	2.4 Demonstrate the site's responsiveness and resilience to respond to water risks	2.4.1 A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be <i>identified</i> .	Yes			NWNA Poland provided their current Stormwater Management Plan and Integrated Contingency plan which included a description of how the facility handles and responds to emergencies associated with various risks, including water-related issues and risks to environmentally sensitive areas. Modifications to the plans are captured through revision/amendment comments and an annual review is part of standard procedures to evaluate the plan's effectiveness.	

						In addition, the Water Stewardship Plan is a working document which documents identification of water risks through performance, evaluation, and stakeholder consultation. Stakeholders include the relevant public-sector agencies responsible for infrastructure. The WSP documents annual meetings with the local authority with discussions on supply reliability and resiliency.	
	Advanced Indicator	2.4.2 Advanced Indicator A plan to mitigate or adapt to water risks associated with climate change projections developed in co-ordination with relevant public-sector and infrastructure agencies shall be <i>identified</i> .				This Advanced Indicator was not considered for the Site	
Advanced Points Step 2							15
STEP 3: Implement							
Level	Criteria	Indicator	Yes	No	NA	Objective Evidence	Points
	3.1 Implement plan to participate positively in catchment governance.	3.1.1 Evidence that the site has supported good catchment governance shall be <i>identified</i> .	Yes			The Factory 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 expand education on AWS and outcomes toward good water governance.	
		3.1.2 Measures <i>identified</i> to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be <i>implemented</i> .	Yes			Nestlé developed and abides by <i>Nestlé Guidelines on Respecting the Human Rights to Water and Sanitation</i> as one tool to assess the impact of Nestle operations on communities to access water (water rights) and sanitation. Additional Nestlé tools and efforts complementing the Guidelines include the Community Relations Process and water-related outreach. Excluded water rights have not been identified through stakeholder engagements, including with key water agencies. As part of a continued dialog with the community, NWWA pursue feedback on this topic.	
	Advanced Indicator	3.1.3 Advanced Indicator Evidence of improvements in water governance capacity from a site-selected baseline date shall be <i>identified</i> .	Yes			A list of actions performed by the NWWA Poland site was provided and reviewed, containing details of several efforts performed by the NWWA Poland site to: provide access to source waters (making available more data for governance use), contribute to water sources adaptive management, studies, and plans which have improved governance implications within and outside their catchments.	2
	Advanced Indicator	3.1.4 Advanced Indicator Evidence from a representative range of stakeholders showing	Yes			Documentation from multiple stakeholders was reviewed and confirmed during stakeholder interviews that NWWA Poland Factory is consistently viewed as a positive contributor to the catchments and State of Maine.	2

		consensus that the site is seen as positively contributing to the good water governance of the catchment shall be <i>identified</i> .					
	3.2 Implement system to comply with water-related legal and regulatory requirements and respect water rights.	3.2.1 A process to verify full legal and regulatory compliance shall be <i>implemented</i> .	Yes			The NWNA Compliance Matrix was provided and reviewed. Included in the matrix are the listed permits and responsible staff to ensure maintenance of compliance. A third-party is contracted to confirm compliance is maintained. In addition, the facility is ISO 14001 Certified (documentation for this certification were reviewed).	
		3.2.2 Where water rights are part of legal and regulatory requirements, measures <i>identified</i> to respect the water rights of others including Indigenous peoples, shall be <i>implemented</i> .	Yes			The Factory's water use is within identified water rights. The primary site water source in the catchment is the Lake Auburn. Spring water provided for Factory use is within water rights identified by the State of Maine. Excluded water rights have not been identified through conversations with stakeholders.	
	3.3 Implement plan to achieve site water balance targets.	3.3.1 Status of progress towards meeting water balance targets set in the water stewardship plan shall be <i>identified</i> .	Yes			Water withdrawal, water withdrawal rates, energy consumption and production volume are tracked monthly and compared to previous years monthly values. The site has worked to improve its water efficiency as per its targets in 2019 by implementing the following measures: contact tank run-out programming and flushing optimization. The site achieved a WWR of 1.120 versus target of 1.110 for 2019.	
		3.3.2 Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be <i>implemented</i> .	Yes			NWNA establishes site targets annually to improve water balance towards improving efficiency and strives to reduce volumetric total.	
		3.3.3 Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be <i>identified</i> .	Yes			The site is not re-allocating water savings.	
	Advanced Indicator	3.3.4 Advanced Indicator				This Advanced Indicator was not considered for the Site.	

		The total volume of water voluntarily re-allocated (from site water savings) for social, cultural and environmental needs shall be quantified .					
	3.4 Implement plan to achieve site water quality targets.	3.4.1 Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified .	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. Wastewater results are within permitted values.	
		3.4.2 Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified .	Yes			Water quality is a shared water challenge and an AWS Outcome. Improvements to water quality are achieved through monitoring and management.	
	3.5 Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.	3.5.1 Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented .	Yes			The Factory has established targets and goals associated with water withdrawal management. Progress is documented in the Water Stewardship Plan.	
	Advanced Indicator	3.5.2 Advanced Indicator Evidence of completed restoration of non-functioning or severely degraded Important Water-Related Areas including where appropriate cultural values from a site-selected baseline date shall be identified . Restored areas may be outside of the site, but within the catchment.				This Advanced Indicator was not considered for the Site.	
	Advanced Indicator	3.5.3 Advanced Indicator	Yes			Stakeholder discussions with the Range Pond Lake Association, the citizen -based group, related to Range Ponds benefitted from technical expertise provided by	2

		Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the healthy status of Important Water-Related Areas in the catchment shall be <i>identified</i> .			NWNA staff and consultants with information and discussions related to water quality issues.	
	3.6 Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.	3.6.1 Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be <i>identified</i> and where applicable, <i>quantified</i> .	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. Pledged compliance was achieved within the Poland facility.	
		3.6.2 Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for Indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.	Yes		NWNA uses a self-assessment tool at each site to review access to drinking water, sanitation and hygiene awareness (WASH). The Factory is not impacting WASH of communities. NWNA discussions with stakeholders did not indicate actual or perceived concern that site was impinging on human right to safe water and sanitation in catchment.	
	Advanced Indicator	3.6.3 Advanced Indicator A list of actions taken to support the provision to stakeholders in the catchment of access to safe drinking water, adequate sanitation and hygiene awareness shall be <i>identified</i> .	Yes		NWNA Poland site provided documentation with evidence of site donations (473 pallets) of bottles of waters to different organizations. Stakeholder feedback was also reviewed on the Poland Springs agreement and participation with the Maine Emergency Management Agency, especially during COVID-19.	5

		<p>3.6.4 Advanced Indicator In catchments where WASH has been <i>identified</i> as a shared water challenge, evidence of efforts taken with relevant public-sector agencies to share information and to advocate for change to address access to safe drinking water and sanitation shall be <i>identified</i>.</p>				This Advanced Indicator was not considered for the Site.	
	3.7 Implement plan to maintain or improve indirect water use within the catchment.	3.7.1 Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be <i>quantified</i> .	Yes			Indirect water use targets in the Water Stewardship Plan include engaging with vendors in catchment. NWNA has reached out to multiple suppliers, with two suppliers providing information on AWS and requested water use data.	
		3.7.2 Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be <i>identified</i> .	Yes			Communication requesting details from vendors were provided. Two suppliers provided information on AWS and requested water use data.	
	Advanced Indicator	<p>3.7.3 Advanced Indicator Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.</p>	Yes			Vendor outreach communications were reviewed which provided information on the source of operation's water, annual water volume consumed, percentage of your operation that supplies the Poland factory, source of water, water intensity for product/service, information on effluent water quality, and a list of recent water savings initiatives.	5
	3.8 Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.	3.8.1 Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be <i>identified</i> .	Yes			Evidence indicated there are no concerns with any shared water-related infrastructure. NWNA regularly shares data with stakeholders.	

	3.9 Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.	3.9.1 Actions towards achieving best practice, related to water governance, as applicable, shall be implemented .	Yes			NWNA team engages with catchment authorities and other stakeholders to share information, best practices and drive water stewardship efforts, one example is the participation and collaborative efforts of Water Resource Planning Committee.	
		3.9.2 Actions towards achieving best practice, related to targets in terms of water balance shall be implemented .	Yes			Sector specific efficiency metric of water use ratio (liters of water used in the process/liter of bottles water) are used to track onsite efficiency and established targets to monitor continual improvement. The 2019 Site WWR of 1.120 l/l was slightly above the Site Goal of 1.110. However, significant efforts were undertaken to reduce total water usage and increase operational efficiency.	
		3.9.3 Actions towards achieving best practice, related to targets in terms of water quality shall be implemented .	Yes			NWNA exceeds requirements outlined with sampling frequency, parameters analyzed and consistency across the business unit. Water quality data provided meets and exceeds regulatory requirements. Effluent is managed appropriately and in accordance with permit limits.	
		3.9.4 Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented .	Yes			NWNA follows practices described by ProForest by assigning Natural Resource Manager for each site who focuses on maintenance of springs and other IWRAs. NWNA follows good practice guidelines for High Conservation Value assessments. A <i>practical guide for practitioners and auditors</i> and Assessment, management and monitoring of High Conservation Value Forest A <i>practical guide for forest managers</i> , as set by ProForest.	
		3.9.5 Actions towards achieving best practice related to targets in terms of WASH shall be implemented .	Yes			There is adequate WASH in the catchment. NWNA provides bottled water donations to the community on a monthly basis.	
	Advanced Indicator	3.9.6 Advanced Indicator Achievement of identified best practice related to targets in terms of good water governance shall be quantified .	Yes			Poland Spring team engages with catchment authorities and other stakeholders to share information, best practices and drive water stewardship efforts. Several of these efforts undertaken by Poland Spring resulted in updates to existing local water resource regulations, funding contribution, and advancement in climate change research. One example is the Maine Cooperative Snow Survey, an initiative to which Poland Spring participates, to collect, interpret, and distribute information on the depth and water content of Maine's snowpack in the late Winter and early Spring, when the danger of flooding in Maine's rivers and streams is greatest. The survey is conducted at each spring site station that the Poland factory uses. Other examples include the publicly available spring brochures (containing flow and water quality data and distributed to local and state agencies) and the long-standing participation in regional and state-level advisory bodies (Main Board of Environmental Protection,	8

					the Drinking Water Commission, and the Water Resource Planning Committee) that foster and expand water stewardship.	
	Advanced Indicator	3.9.7 Advanced Indicator Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified .	Yes		Poland site provided documentation to support evidence of improvements in the WWR in the last ten years, despite a general increase in their production volume.	8
	Advanced Indicator	3.9.8 Advanced Indicator Achievement of identified best practices related to targets in terms of water quality shall be quantified .	Yes		Annual monitoring report summaries and other documents were provided and reviewed for all spring sources used by the Poland factory, containing flow data and evidence of water samples and monitoring efforts conducted regularly and frequently at the water source as well as in the adjacent environment. These data, all in compliance with local and federal screening criteria, are reported to local and state agencies on a monthly, quarterly and/or annual basis and are available to agencies for water governance tracking and planning. Other examples of best practices include: - valid wastewater permits and effluent water quality results showing compliance with applicable criteria. - Annual review of incoming data to be within historic trends and values - good CIP effluent management from the spring sites to the receiving factory	8
	Advanced Indicator	3.9.9 Advanced Indicator Achievement of identified best practices related to targets in terms of the site's maintenance of Important Water-Related Areas have been implemented .	Yes		Several documents were reviewed with evidence of best practices achieved related to Poland Spring site maintenance of IWRA. Examples include: - Annual spring monitoring report of all the site water springs - Forest management to promote healthy and productive forests and protect water quality as needed in various areas of the Freshwater Forested Wetlands surrounding the Poland Spring sites. - Management of effluent discharge constituent concentrations to keep effluent sample results below permit limits	8
	Advanced Indicator	3.9.10 Advanced Indicator Achievement of identified best practice related to targets in terms of WASH shall be quantified .			This Advanced Indicator was not considered for the Site .	
	Advanced Indicator	3.9.11 Advanced Indicator A list of efforts to spread best practices shall be identified .	Yes		A poster representing the water balance in Maine was prepared by NRNA. The poster well represents the site conceptual model and summarizes the actions undertaken by the site in collaboration with other agencies to promote best practices within the watersheds. In addition, a list of several outreach efforts is compiled and	3

						provided containing specific names of different agencies, companies, foundations, points of contacts, and dates and notes of meetings.	
	Advanced Indicator	3.9.12 Advanced Indicator A list of collective action efforts, including the organizations involved, positions of responsible persons of other entities involved, and a description of the role played by the site shall be <i>identified</i> .	Yes			A list of several collective actions was provided and reviewed. The list contains information on parties and individuals involved, roles played by the NWNA Poland site, and references to the evidence of the change obtained through effective implementation of the actions. During the audit, additional information was provided regarding the multiple projects to improve water balance, quality, and/or governance within and outside the catchment. The common denominator of all their successful collaborations with different agencies and companies is the site's willingness to share their water stewardship experience, technology, contacts, hydrogeologic understanding, and ability to access funding.	14
	Advanced Indicator	3.9.13 Advanced Indicator Evidence of the <i>quantified</i> improvement that has resulted from the collective action relative to a site-selected baseline date shall be <i>identified</i> and evidence from an appropriate range of stakeholders linked to the collective action (including both those implementing the action and those affected by the action) that the site is materially and positively contributing to the achievement of the collective action shall be <i>identified</i> .	Yes			Documentation was provided on evidence of the positive impact of collaborative efforts towards more efficient governmental policies, increased education and outreach, technical assistance, increased project opportunities. The documentation also includes explicit acknowledgement from different stakeholders that the NWNA Poland site contributed to the positive outcome.	10

Advanced Points Step 3 79

STEP 4: Evaluate

Level	Criteria	Indicator	Yes	No	NA	Objective Evidence/Findings	Points
	4.1 Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution	4.1.1 Performance against targets in the site's water stewardship plan and the contribution to achieving	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	

	to achieving water stewardship outcomes.	water stewardship outcomes shall be evaluated				target. Further evaluation will be conducted during the surveillance and renewal audits.	
		4.1.2 Value creation resulting from the water stewardship plan shall be evaluated .	Yes			NWNA has created value related to multiple efforts including WASH access, Good Science Scholarships and outreach/educational benefits in the catchment.	
		4.1.3 The shared value benefits in the catchment shall be identified and where applicable, quantified .	Yes			Shared value benefits were provided in the Economic Impact Report, The Economic & Fiscal Impact on Maine on the Poland Spring Company.	
		4.1.4 Advanced Indicator A governance or executive-level review, including discussion of shared water challenges, water risks, and opportunities, and any water-related cost savings or benefits realized, and any relevant incidents shall be identified .				This Advanced Indicator was not considered for the Site.	
	4.2 Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.	4.2.1 A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified .	Yes			No water-related emergency events or shutdown occurred that was water related. The annual environmental reviews would document these emergency events, if any. The facility has a current ICP.	
	4.3 Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.	4.3.1 Consultation efforts with stakeholders on the site's water stewardship performance shall be identified .	Yes			Internal and external stakeholder outreach conducted and documented in the Stakeholder Outreach Log. Responses covered the main topics of catchment areas, WASH, IWRAs, water efficiency, water savings projects.	

	Advanced Indicator	4.3.2 Advanced Indicator The site's efforts to address shared water challenges shall be evaluated by stakeholders. This shall include stakeholder reviewing of the site's efforts across all five outcome areas, and their suggestions for continual improvement.	Yes			Communication with stakeholders were provided containing a presentation describing Nwana Poland site's efforts contributing to address shared water challenges, through positive participation in good water governance and supporting sustainable water balance, good water quality, public education, healthy status of IWRA, and WASH. The correspondence also requested, and received, feedback and additional stakeholders' suggestions to contact.	6
	4.4 Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.	4.4.1 The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified .	Yes			The Water Stewardship Plan is a working document updated annually to reflect on-going actions and completed projects. The Plan tracks targets and actions tied to best practice and AWS outcomes addressed. Performance and stakeholder consultation with respect to the projects are included. Stakeholder consultation has led to sharing projects and adapting to stakeholder projects as requested.	
Advanced Points Step 4							6
STEP 5: Communicate and Disclose							
Level	Criteria	Indicator	Yes	No	NA	Objective Evidence/Findings	Points
	5.1 Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.	5.1.1 The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed .	Yes			Nwana Poland 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 tours also include presentations on the site's water stewardship projects and implementation of the AWS International Water Stewardship Standard. Currently factory tours are on hold due to COVID-19.	
	5.2 Communicate the water stewardship plan with relevant stakeholders.	5.2.1 The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.	Yes			Nwana Poland provided the outreach log and communication with catchment authorities about the AWS process. The AWS Presentation summarizes the water stewardship plan and outcomes. The Presentation was shared with visitors of the Factory tours and other stakeholders. Communication and outreach confirmed through stakeholder interviews. Currently factory tours are on hold due to COVID-19.	
	5.3 Disclose annual site water stewardship summary,	5.3.1 A summary of the site's water stewardship	Yes			The stakeholder presentation was reviewed, the presentation includes the site's water stewardship performance results. Nwana Poland conducted public/consumer	

	including the relevant information about the site's annual water stewardship performance and results against the site's targets.	performance, including quantified performance against targets, shall be disclosed annually at a minimum.				education outreach through tours; distribution of stakeholder presentations and providing stakeholders presentations that reviewed the sites water challenges, stakeholder feedback, targets, with implementation outcomes. The AWS Presentation was distributed to stakeholders as documented in the Outreach Log.	
	Advanced Indicator	5.3.2 Advanced Indicator The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report.				This Advanced Indicator was not considered for the Site.	
	Advanced Indicator	5.3.3 Advanced Indicator Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report.				This Advanced Indicator was not considered for the Site.	
	5.4 Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.	5.4.1 The site's shared water-related challenges and efforts made to address these challenges shall be disclosed .	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 with the facility. NWNA Poland conducted public/consumer education outreach through tours and providing stakeholders presentations that reviewed the sites water challenges, stakeholder feedback, targets, with implementation outcomes.	
		5.4.2 Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified .	Yes			See 5.4.1	
	5.5 Communicate 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.	5.5.1 Any site water-related compliance violations and associated corrections shall be disclosed .	Yes			Violations are publicly available through state and federal reporting (ECHO/US EPA). There were no site water-related violations reported via ECHO.	
		5.5.2 Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.	Yes			See 5.5.1	

		<p>5.5.3 Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.</p>	<p>Yes</p>		<p>Violations are publicly available through state and federal reporting (ECHO/US EPA). There were no violations reported via ECHO. The ECHO reporting system would include violations that pose a significant risk and threat to human or ecosystem health.</p>	
Advanced Points Step 5						0